

# Fiordland Wapiti Herd of Special Interest

## Draft Herd Management Plan

### Submission Attachments - submitter last names Cot - H

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# Nada Cottrell

Submission Details

## Eirwen Harris Mitchell

---

**From:** Nada Cottrell s9(2)(a)  
**Sent:** Sunday, 7 December 2025 3:55 pm  
**To:** wapitiHOSIHMP; SikaHerdOfSpecialInterest@doc.govt.nz  
**Subject:** Submission on the Draft Wapoti Herd of Special Interest (HOSI) Management Plan  
And my Submission on the Draft Sika Herd of Special Interest (HOSI) Management Plan.

**Categories:** Green category

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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.

Nada Cottrell

s9(2)(a)

s9(2)(a)

s9(2)(a)

s9(2)(a)

# John Cruden

Submission Details

## Eirwen Harris Mitchell

---

**From:** John Cruden [s9(2)(a)]  
**Sent:** Monday, 8 December 2025 8:43 am  
**To:** wapitiHOSIHMP  
**Subject:** Submission on Wapiti  
**Attachments:** Wapiti Herd of Special Interest.pdf

**Categories:** Green category

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

Thank you.

--

John Cruden

[s9(2)(a)]

[s9(2)(a)]

[s9(2)(a)]

[s9(2)(a)]

ph/txt [s9(2)(a)]

# Submission on a Wapiti “Herd of Special Interest” in Fiordland National Park

## Introduction

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

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

I opposed the Game Animal Council (Herds of Special interest) Amendment Bill, and I will be writing a similar submission on the Sika herd.

## Key Points

1. National Parks Act 1980 set out to try and preserve our landscapes and its biota, preferring to eradicate pests rather than breed them (Section 4(2)(b)). Creating a HOSI is explicitly contradicting the Act.
  - 1.1. Cabinet Paper 25-B-0156 shows that in June 2025 the Government decided that the way to deal with the inconvenient contradiction was to quickly progress a change to the 1980 Act under Budget 2025 urgency procedures, resulting in reduced time for public consultation.
  - 1.2. The yet to be passed amendment to the Game Council Act 2013 shows that this Government is not about conservation in the slightest. The Government seems to be willing to allow our fragile flora and fauna to be degraded to earn a little revenue.
2. UNESCO World Heritage site, Te Wahipounamu, confers upon us a considerable status, as it contains some of the best modern representations of the original flora and fauna of Gondwana. Along with it goes, however, a need to protect it from introduced species.
3. In March 2024, Forest & Bird filed an application for judicial review of the legality of the community agreement between the Director-General of DOC and FWF (Fiordland Wapiti Foundation). The action has been paused while the parties work out a settlement. This means that the herds of interest may be scuppered by whatever emerges from the contest.
4. The Newsroom reported on the 17th November 2025 post that the Seed Ratio Index (SRI) was indicating that currently the area for Wapiti is overstocked with deer, and you can also see a similar

concern in the briefing to Minister Meager on 2nd May 2025 where low SRI are noted. A target of zero on the index is planned to be achieved after 10 years (most index numbers are below zero). DoC comments “this will require a reduction in deer numbers in forested areas”, and this will make hunting less appealing.

5. There is a significant cost to the Crown in this proposal. FWF estimates \$457,000 with DoC thinking that \$500,000 is more likely, on top of that DoC has to monitor the science behind the enterprise, costing another \$40,000 per annum by its estimate.
6. There is a need for someone to enforce the hunting “beats” in rugged terrain. This enforcement, and potentially extracting injured hunters, is likely to fall on the Department.
7. Mana whenua consultations are just that, falling short of the full engagement that the Treaty expects.
8. Like this submission, everything is being done at haste. There are reduced consultations with the public, processes being conducted under urgency and ahead of settlements by the court. This seems to me to be badly made law and the decisions on these proposals should be suspended.

## Conclusion

I strongly feel that the stocking of pestilent ungulates in our Public Conservation Areas is illegal and harmful. The Bill should be withdrawn, the proposed Wapiti herd culled as signalled in 1980 National Parks Act.

## Links

[Briefing to the Minister](#)

[Newsroom 19 November 2025](#)

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

# Matt Dale - Kati Huirapa Runaka ki Puketeraki

Submission Details

## Eirwen Harris Mitchell

---

**From:** Matt Dale s9(2)(a)  
**Sent:** Tuesday, 9 December 2025 10:26 am  
**To:** wapitiHOSIHMP  
**Subject:** Submission on Wapati HOSI  
**Attachments:** KHRKP letter of opposition for Wapati Herd of Special Interest Draft Herd Management Plan.doc

**Categories:** Green category

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Kia ora, please find attached Kati Huirapa Runaka ki Puketeraki's letter of opposition to the proposal to manage wapiti deer as a herd of national significance. Apologies that the letter is a day late, can you please let me know if it is still able to be accepted?

Kā mihi,

Matt.D.

### **Matt Dale**

Kaiwhakahaere Whakakaupapa Taiao – Kati Huirapa Runaka ki Puketeraki

Ph: s9(2)(a)

Email: s9(2)(a)





## Kāti Huirapa Rūnaka ki Puketeraki

9 December 2025

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

Tēnā Koutou Katoa,

Kāti Huirapa Rūnaka Ki Puketeraki Letter of Opposition regarding the Draft herd management plan for proposed wapati deer Herd of Special Interest

Noho ora mai,

Kāti Huirapa Rūnaka ki Puketeraki would like to submit on a draft plan to manage wapati deer as a potential Herd of Special Interest (HOSI) in the Fiordland National Park.

This plan seeks to manage Wapati deer numbers at a level that:

- enhances the recreational hunting experience, including the opportunity to hunt healthier animals; and
- improves natural biodiversity and forest regeneration.

The Plan has been reviewed by the Rūnaka's Komiti Kaupapa Taiao, who wish to submit to oppose.

This position was reached after reviewing the proposed plan and associated information, particularly considering the significance of the area to Tākata whenua and the Taoka species that reside in the area, relying upon the biota put at risk by these invasive browsers.

Kāti Huirapa would also like to discourage the precedent of partial protection of an introduced Pest species. This could lead to widespread normalization of the protection of invasive species at the cost of our native biodiversity. HOSI plans may be prioritizing interests of hunters and hunting tour companies over that of conservation and native biodiversity, harming the mana and taoka of and within these national parks that were set up for protection, not recreational hunting.

**Runaka Office – C/- Karitane PDC, Karitane, 9440**  
**Phone (03) 465 7300, Email [admin@puketeraki.nz](mailto:admin@puketeraki.nz)**  
**<http://www.puketeraki.nz>**

The balloted systems these parks also work under will further privatize and limit public access to these significant national areas.

The issue also extends to the effort to maintain a population of “healthier animals” where in many parts of the rest of the country other ungulate populations are reaching unchecked plague numbers not seen in decades. It is seen that energy keeping these Hosi within accepted margins could be better spent across the country on eradication projects.

This proposal states one of the goals is to reduce numbers to “improve natural biodiversity and forest regeneration” while this sounds positive compared to uncontrolled regulation or the current state, there are concerns we have. This is regarding similar promises following the 1993 Himalayan Tahr control plan. Since the implementation of a proposed limit there has been little success to achieve this promise, and numbers of Tahr are uncontrolled and spreading. Considering this, if the proposal goes ahead, Kāti Huirapa would like to see enforceable goals in native regeneration, with set time to see this improvement in biodiversity and native habitat. If these conditions are not met there should be promises to remove any herd protections and consider them pest species.

Noho ora mai, rā



Matt Dale  
Kaiwhakahaere Whakakaupapa Taiao  
Kāti Huirapa Rūnaka ki Puketeraki



# Cornelius den Haring

Submission Details

Submission on Wapiti Herds of special interest Draft Plan

Dated 19<sup>th</sup> November 2025

Submitted by:

Cornelius den Haring

s9(2)(a)

s9(2)(a)

s9(2)(a)

Member NZDA, NZAHAA, active hunter (domestic and international) since 1973, NZDA warranted shooting range office, Accredited Police range inspector.

Thank you for the opportunity to submit on the Wapiti herds of special interest plan.

I am willing and able to make an in-person submission or explain my submission should this be desirable or requested/necessary.

- 1) I support the GAC and NZDA submissions.
- 2) I support the essence of and draft plan details.
- 3) I support the FWF and its ongoing activities both separately and as part of the draft plan.

It should be noted that since 1993 the FWF has undertaken a version of the plan and shown positive outcomes can be achieved both for conservation and hunting alike.

In the absence of any other coherent plan (draft or otherwise) supporting the current draft plan is the only viable option on the table.

I would recommend/suggest that the current review period (minimum 5 years) be amended initially to a review in year 2 or 3 and thereafter a min of every 5 years. Given it is a new a “plan” and has no current precedent or existing model to be based off, it would be prudent to assess its objectives earlier.

# Bruce Dickison

Submission Details

## Eirwen Harris Mitchell

---

**From:** s9(2)(a)  
**Sent:** Saturday, 6 December 2025 3:47 pm  
**To:** wapitiHOSIHMP  
**Subject:** Please leave the wapiti and sika herds alone.They are part of our culture to educate young hunters on how to safely manage and control wild life in this country with out all the buacratic nonsense compared to other countries.Some of these other hyped ...

**Categories:** Green category

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Your faithfully Bruce Dickison.

s9(2)(a)

# Tony Doy

Submission Details

## Eirwen Harris Mitchell

---

**From:** Tony Doy s9(2)(a)  
**Sent:** Sunday, 7 December 2025 11:41 am  
**To:** SikaHerdOfSpecialInterest@doc.govt.nz; wapitiHOSIHMP  
**Subject:** HOSI

**Categories:** Green category

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Tony Doy

s9(2)(a)

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

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

Ngā mihi nui. 🌱

--

Tony Doy s9(2)(a)

# Kevin Dunn

Submission Details

6 December 2025

Submitter: Kevin Dunn

Email: s9(2)(a)

To: The Department of Conservation

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

## **Feedback on the Fiordland Wapiti Herds of Special Interest Proposed Management Plan**

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

I oppose the designation of Wapiti as a herd of special interest in Fiordland National Park.

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

### **Background**

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

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

### **The Herd Management Plan (the Plan)**

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

The strategies and objectives are vague, poorly defined and contradictory. There are no quantifiable and measureable outcomes to control the pests or to improve

biodiversity over time, which should be fundamental in well prepared control plan. An independent, robust monitoring program with clearly defined targets and responsibilities is needed to ensure the Plan is performing as expected.

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

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

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

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

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

# Mark Elliotte - NZDA Upper Clutha Branch

Submission Details

## Eirwen Harris Mitchell

---

**From:** Mark Elliott s9(2)(a)  
**Sent:** Monday, 8 December 2025 2:16 pm  
**To:** wapitiHOSIHMP  
**Cc:** 'Upper Clutha Deerstalkers'  
**Subject:** Fiordland Wapiti HOSI Management Plan

**Categories:** Green category

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Hello,

I write on behalf of the NZDA Upper Clutha Branch and we support the establishment of a Wapiti Herd Of Special Interest.

We value the herd's history and heritage. The hunting of wapiti has evolved into a unique conservation activity involving hut and track maintenance, the clearing of pest traplines and the culling of red and hybrid deer and any inferior Wapiti stags from the Wapiti herd area. Wapiti hinds are also culled to achieve conservation goals.

The legacy of pursuing of Wapiti trophies allows NZDA members and their families the opportunity to enjoy the natural environment of the Fiordland Wapiti area and it is positive for their health and wellbeing.

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

The Operational Plan must remain separate to the Herd management Plan, as , as a tool , the Operational Plan presents an opportunity to not only manage Wapiti but also advance deer management of other species across New Zealand.

All funds for the Wapiti HOSI must 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 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 3<sup>rd</sup> 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,  
Mark Elliotte  
President  
Upper Clutha Branch NZDA

# Mark Elliotte

Submission Details

## Eirwen Harris Mitchell

---

**From:** Mark Elliott s9(2)(a)  
**Sent:** Monday, 8 December 2025 2:19 pm  
**To:** wapitiHOSIHMP  
**Cc:** s9(2)(a)  
**Subject:** Wapiti HOSI Herd Management Plan

**Categories:** Green category

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Dear Sir / Madam,

I support the Wapiti Herd Management Plan but believe some amendments are needed for it to work well for the Fiordland Wapiti herd.

I value the herd's history and heritage. I enjoy reading about the hunting trips of the hunters in the early 1900s and the adventures they had. The hunting of wapiti has evolved into a unique conservation activity involving hut and track maintenance, the clearing of pest traplines and the culling of red and hybrid deer and any inferior Wapiti stags from the Wapiti herd area. Additionally, Wapiti hinds are culled to achieve conservation goals.

The legacy of pursuing of Wapiti trophies allows families to enjoy the natural environment of the Fiordland Wapiti area and is positive for the health and well being of those who opt to enjoy the experience.

The Herd Management Plan should support hunter and community-led management and positive social and economic outcomes for Te Anau and the wider wapiti community area.

All funds for the Wapiti HOSI must 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 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 3<sup>rd</sup> party as the watchdog for the government.

Thanks and regards,  
Mark Elliott

s9(2)(a)



# Brad Evison

Submission Details

## Eirwen Harris Mitchell

---

**From:** Brad Evison s9(2)(a)  
**Sent:** Monday, 8 December 2025 5:12 pm  
**To:** wapitiHOSIHMP  
**Subject:** Wapiti HOSI Management Plan

**Categories:** Green category

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My submission below.

My name is Brad Evison and I **support** the Herd Management Plan in principle but believe amendments are needed for it to work well for the Fiordland Wapiti herd.

I have been lucky enough to have accessed some of the famous valleys, tops and parts of the Wapiti area including the Glaisnock, Wapiti River and Wild Natives. Visiting the Wapiti Area is a unique opportunity and one I value highly. The area and the herd are a special resource and one I hope can be preserved for the future.

### Specific comments on the Plan requiring amendment

1. The Herd Management plan should support hunter and community-led management and positive social and economic outcomes.
2. All funds for the Herd of Special Interest (Wapiti) must be sent directly from the funding source to the implementing end user or group. In this case the Wapiti Foundation.
3. It should not be routed through DOC or GAC or any government body for discretionary redistribution.
4. The operational plan should serve as a flexible management tool that inspires innovation, and this HOSI presents an opportunity not only to manage wapiti but also to advance deer control techniques in New Zealand.
5. This plan must remain separate from the Herd management plan. This document needs to be an adapted management plan that is developed by the implementer of the Herd of Special Interest, in this case the Fiordland Wapiti Foundation.
6. Monitoring enables adaptive management and demonstrates whether the management of Fiordland Wapiti Foundation is achieving the objectives and strategies of this Plan.
  - Management including monitoring should relate back to these objectives and be efficient and effective i.e. they should not be costly and provide little value. They should inform management responses aligned with an adaptive management framework. Overdue bureaucracy and draconian approaches should be avoided as they are not efficient and do not result in tangible outcomes, as evidenced by the nibble and versatile approach of the FWF over the past two decades in particular.

- Monitoring should only reflect the impact deer have on the environment. Faecal pellet counts should not be included. They are subjective and do not truly reflect deer impacts.

7. Delegations should be assigned to groups with the right skills.
8. The Fiordland Wapiti Foundation possesses the expertise required to implement and manage the HOSI and operational plan, having demonstrated consistent success in this area over the past two decades.
9. Clear guidance is needed on whether HOSI falls under DOC or GAC legislation.
10. A Wapiti HOSI is not about "Control" of Wapiti; it is about "Active Management."
11. I would like to see all reference to the term 'control' removed from the HMP in preference for the term 'management,' to reflect the reality of what a Wapiti HOSI HMP is trying to achieve.
12. The 'control' narrative and that style of language reflects previous failed approaches to managing deer in New Zealand

Brad Evison  
Commercial Manager  
Done Rite Contracting 2017 Ltd

M: [REDACTED]

E: [REDACTED]



# Adam Fairmaid

Submission Details

## Eirwen Harris Mitchell

---

**From:** adam fairmaid s9(2)(a)  
**Sent:** Saturday, 6 December 2025 5:03 pm  
**To:** wapitiHOSIHMP  
**Subject:** HOSI HMP

**Categories:** Green category

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***My name is Adam Fairmaid and I am President of the Fiordland Wapiti Foundation.***

***I support the Herd Management Plan in principle but believe amendments are needed for it to work well for the Fiordland Wapiti herd.***

***Visiting Fiordland to hunt Wapiti has been a massive part of my life, both in terms of the thousands of days spent in Fiordland and the impact that spending time there has on my happiness and wellbeing. It is incredibly important to me that the "Wapiti area" is environmentally healthy and to this end the Foundation has met all targets set in terms of animals recovered and alpine monitoring. My wife and two daughters share my love of the area.***

***That the Herd Management plan should support hunter and community-led management and positive social and economic outcomes.***

***All funds for the Herd of Special Interest (Wapiti) must be sent directly from the funding source to the implementing end user or group. In this case the Wapiti Foundation. It should not be routed through DOC or GAC or any government body for discretionary redistribution. The FWF is the gold standard for hunter lead conservation and have a proven track record that is undeniable. Re-routing the Foundations funding stream through a third party is a bad idea. Changes of personnel in those bodies can lead to inconsistent decision making and uncertainty for the Foundation that the conditions that we operate under will remain the same.***

***Financial reporting should not be a requirement within the Herd Management Plan.***

***The operational plan should serve as a flexible management tool that inspires innovation, and this HOSI presents an opportunity not only to manage wapiti but also to advance deer control techniques in New Zealand. This plan must remain separate from the Herd management plan. This document needs to be an adapted management plan that is developed by the implementer of the Herd of Special Interest, in this case the Fiordland Wapiti Foundation.***

***Monitoring enables adaptive management and demonstrates whether the management of Fiordland wapiti is achieving the objectives and strategies of this Plan.***

- Management including monitoring should relate back to these objectives and be efficient and effective i.e. they should not be costly and provide little value. They should inform management responses aligned with an adaptive management framework. Overdue bureaucracy and draconian approaches should be avoided as they are not efficient and do not result in tangible outcomes.***
- Monitoring should only reflect the impact deer have on the environment. Faecal pellet counts should not be included. They are subjective and do not truly reflect deer impacts.***

***Delegations should be assigned to groups with the right skills. The Fiordland Wapiti Foundation possesses the expertise required to implement and manage the HOSI and operational plan, having demonstrated consistent success in this area over the past two decades.***

***Clear guidance is needed on whether HOSI falls under DOC or GAC legislation.***

***A Wapiti HOSI is not about “Control” of Wapiti; it is about “Active Management.” I would like to see all reference to the term ‘control’ removed from the HMP in preference for the term ‘management,’ to reflect the reality of what a Wapiti HOSI HMP is trying to achieve.***

***The ‘control’ narrative and that style of language reflects previous failed approaches to managing deer in New Zealand.***

***Thank you***

# Terry Farrell

Submission Details

## Eirwen Harris Mitchell

---

**From:** Terry Farrell s9(2)(a)  
**Sent:** Sunday, 7 December 2025 6:52 pm  
**To:** wapitiHOSIHMP  
**Cc:** SikaHerdOfSpecialInterest@doc.govt.nz  
**Subject:** Submission on Wapiti control management plan

**Categories:** Green category

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Terry J Farrell

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. However, sadly it looks like this decision is already going ahead, so these are the non-negotiable conditions that must be met:

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- 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.

Send to,  
wapitihosihmp@doc.govt.nz  
SikaHerdOfSpecialInterest@doc.govt.nz

Ngā mihi nui. 🌱

Terry

s9(2)(a)

# Martin Fey

Submission Details

## Eirwen Harris Mitchell

---

**From:** Martin Fey [s9(2)(a)]  
**Sent:** Saturday, 6 December 2025 10:47 am  
**To:** wapitiHOSIHMP  
**Subject:** Herds of special interest

**Categories:** Green category

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Dear Sir/Madam,

In my opinion there should be no provision for 'herds of special interest ' on the conservation estate.

Is DOC beholden to 'special interest' groups? DOC should be the voice of Aotearoa's indigenous flora and fauna who cannot speak for themselves. Maintaining introduced pest species runs counter to the conservation values that are necessary to stem the decline of unique indigenous species and maintain unique ecosystems.

Have you restructured and made redundant all your conservation expertise? Listen to Forest and Bird, they are now the expert voice it seems.

Sincerely,  
Martin Fey

Martin Fey

[s9(2)(a)]

[s9(2)(a)]

[s9(2)(a)]

office: [s9(2)(a)]

mobile: [s9(2)(a)]

[s9(2)(a)]

# Helene Fougere

Submission Details

## Eirwen Harris Mitchell

---

**From:** Helene Fougere s9(2)(a)  
**Sent:** Monday, 8 December 2025 2:50 pm  
**To:** wapitiHOSIHMP; SikaHerdOfSpecialInterest@doc.govt.nz  
**Subject:** Helene Fougere - Submission on the Draft Wapoti/Sika Herd of Special Interest (HOSI) Management Plan

**Categories:** Green category

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Kia ora,  
this is regarding the  
Draft Wapiti Herd of Special Interest (HOSI) Management Plan and the Draft Sika Herd of Special Interest (HOSI) Management Plan.

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

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

Nga mihi,  
Helene

# Tim Gale

Submission Details

## Eirwen Harris Mitchell

---

**From:** Tim Gale s9(2)(a)  
**Sent:** Monday, 8 December 2025 9:00 pm  
**To:** wapitiHOSIHMP  
**Subject:** Draft Herd Management Plan – Fiordland Wapiti HOSI  
**Attachments:** Submission Draft Herd Management Plan FWF HOSI - Tim Gale.pdf  
**Categories:** Green category

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

Thanks  
Tim Gale

**8 December 2025**

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

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

### **Draft Herd Management Plan – Fiordland Wapiti HOSI**

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

7. Fiordland wapiti are the driver of many hunters across New Zealand to venture to Fiordland with friends and family on what is considered by some as the holy grail of hunting in New Zealand.
  8. The lead up to the Wapiti ballot being drawn is a much-anticipated event with hunters across New Zealand, and social media comes alive with talk about the blocks people secured, access routes, and hunting opportunities etc.
  9. I support changes to legislation that will improve the sustainable management of game animals and hunting and increase hunting opportunities whilst supporting ongoing conservation initiatives throughout New Zealand.
  10. I support and have worked closely with the hunting sector and recognize the immense amount of positive work organisations such as the Game Animal Council, New Zealand Deerstalkers Association, Fiordland Wapiti Foundation, Central North Island Sika Foundation and Tahr Foundation do to ensure that:
    - a. The activity of hunting is encouraged,
    - b. Game animals are sustainably managed, and
    - c. Conservation outcomes are improved.
  11. The hunting sector is the single largest contributor to the management of game animal populations and therefore should be empowered to enable increased game animal management initiatives throughout New Zealand.
- 
12. The greatest example of this is the internationally recognised Fiordland Wapiti Foundation (FWF), who selectively shoot 1,000+ deer consistently year on year from Fiordland and also undertake significant other conservation initiatives.
  13. In undertaking this work, through implementing game animal management principles, the FWF has:
    - a. Increased the value of the Wapiti hunting experience,
    - b. Increased the value of Fiordland National Park as a destination,
    - c. Increased the value of Wapiti deer,

- d. Increased the economic value to the Southland community and beyond.
  - e. Improved the conservation outcomes in the Wapiti Area of Fiordland National Park.
14. Hunters travel both domestically and internationally to hunt Fiordland wapiti. These hunters make significant investments in hunting equipment and drive regional economic growth.
15. The work of the FWF has all been at no cost to the taxpayer; the work is paid for by hunters (domestic and international) and commercial partnerships.
16. This is achieved through the annual ballot providing hunters with a world-class hunting experience during the wapiti bugle.
17. Management operations are funded through the proceeds of the ballot and other sources that removes on average over a 1000 red, hybrid, female and lower quality Wapiti from the Wapiti area annually.
18. Wapiti herd numbers are maintained at a level that enables and promotes the regeneration of browsed indigenous plants.
19. A major predator-trapping initiative runs at no cost to the taxpayer across remote Fiordland valleys to control stoats and rats, and support species like kiwi, who and kea.
- 
20. I support initiatives that increase the quality, value and recognition of game animals and hunting across New Zealand and the designation of a HOSI will continue to raise the profile of this species.
21. I support initiatives that promote hunters, hunter values and the contribution that hunters make across New Zealand.
22. I support the concept of HOSI as an important modern day legislative tool for the sustainable management of Fiordland wapiti and for recognising game animals as valued introduced species that should be managed for both their benefits and their impacts.

23. I support the concept of HOSI because it helps ensure these species—and the hunting of them—remain a valued part of New Zealand’s social fabric.
24. I support the concept of HOSI because it reinforces the value of hunting and strengthens the role of hunters and other entities in responsible game animal management.
25. I submit that the HOSI framework is critical for aligning hunting, community, and conservation values at place, enabling improved outcomes for game animals, hunters, recreational users, and conservationists, acknowledging that these groups frequently overlap.
26. I submit that the HOSI framework provides an opportunity to drive economic growth by enabling more active promotion and management of the herd, increasing value recognition of the herd, and realisation of the associated benefits.
27. I strongly support the Game Animal Council being the administrative body for Herds of Special Interest and submit that the Game Animal Council be delegated all necessary functions to administer all aspects of Herds of Special Interest (including drafting of any Herd Management Plan).
28. I submit that the necessary funding be reappropriated from the Department of Conservation’s core Wild Animal funding to the Game Animal Council to support the necessary delivery of Herds of Special Interest.
29. I strongly oppose the Department of Conservation being the administrative body for Herds of Special Interest as the Department of Conservation in general has a history (in relation to wild/game animals, hunting and hunters) dating back to 1987 of:
- a. failure relating to wild animal control and/or management,
  - b. inaction,
  - c. incompetence,
  - d. being ineffective and inefficient,
  - e. failing to work with hunters in a mana enhancing way that builds trust and achieves positive results.

30. I submit that the Department of Conservation’s mandate is too wide, the legislative framework they work under is a myriad of complexity meaning they get bogged down in layers of bureaucracy which results in ineffectiveness and inefficiency.
31. Sustainable game animal management requires a body (such as the Game Animal Council) who is solely focussed on game animal management, hunters and hunting.
32. I have reviewed the Draft Herd Management Plan (the draft HMP) and recommends amendments to the draft Plan to reflect the intent of a Herd Management Plan so that it aligns with the intent of the Game Animal Council Act and the value associated with Fiordland wapiti and the hunting of wapiti.

<b>1 Introduction</b>		
<b>Overriding considerations</b>		
<b>Commentary</b>		
<p>Whilst the draft Plan lists what the Overriding considerations are, there is no analysis or explanation providing specific details of what the Overriding considerations are and how this Plan would be consistent with specific Considerations that may or may not be found in existing policies and strategies.</p> <p>This presents a risk to the designation of functions to the GAC, the adoption of the plan and in the future, the implementation of the Plan.</p>		
<b>2 Values and key context</b>		
	<b>Position</b>	<b>Recommendation</b>
	<p>As the current drafting stands, the framing of the draft HMP is that of a control plan for conservation outcomes.</p> <p>First and foremost, it is a Herd Management Plan therefore the sections need to be framed in a more fitting structure. The herd should be the focus of the plan, and the focus of the plan should be the herd.</p>	<p>Frame the draft plan in the following order:</p> <ol style="list-style-type: none"> <li>1. Herd and hunting values</li> <li>2. Conservation / stewardship values</li> <li>3. Mana whenua values</li> <li>4. Community values</li> </ol>

	<p>A HMP is a paradigm shift from a control plan. It needs to be a game animal management plan therefore recognising the values of the herd first, and the need to manage to herd to enable both hunting and conservation outcomes.</p> <p>There needs to be a clear delineation between culture, heritage, community and stewardship.</p> <p>Additionally, there is a very limited focus on community values, and in particular the values of hunters and the relationship they hold with the Wapiti herd and the Fiordland National Park.</p>	<p>Remove all reference to control and replace with management or adaptive management.</p> <p>Separate and redraft the sections to better outline the values.</p> <p>More emphasis is placed on the relationship between hunters and hunting of the herd and the benefits that arise from this relationship, i.e. social, health &amp; wellbeing, economic and conservation.</p>
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**3 Objectives and Strategies**

**Commentary**

I support having Objectives and Strategies, however further refinement is needed to provide adequate direction and feedback loops.

The plan should be structured so that values inform the objectives, and objectives inform the strategies. This orderly and repeatable flow provides a sound basis for clear and consistent monitoring of the HMP.

This is primarily a Herd Management Plan (HMP), not a control plan, therefore I submit that the Objectives need to be ordered to reflect the Game Animal Council Act, Section 16(1) being ‘of special interest to hunters, managed for hunting purposes and consistent with overriding considerations’.

The primary function of the draft HMP is the management of the herd and resulting from that will be conservation outcomes therefore objectives should flow in that order.

	<b>Position</b>	<b>Recommendation</b>
Objective 1	<p>Support with amendments.</p> <p>This is primarily a Herd Management Plan, not a control plan.</p>	<p>Submit that Objective 1 be reframed to be should only relate to wapiti impacts and their management.</p> <p>Replace the word ‘restoring’ to ‘improving’ as restoring ecological process is ambiguous and unachievable i.e. what stage is restoration aiming for; prehuman, when Moa existed etc.?</p>
Objective 2	Support.	
Objective 3	<p>Support with amendments. Seeking to recover costs from the hunting community is ambiguous. Is the hunting community recreational hunters or does it include Wild Animal Recovery Operations?</p> <p>This framing is potentially limiting as cost recovery may come from other avenues.</p> <p>There are benefits to the Crown and wider New Zealand through successful herd management and the increased value of wapiti, therefore some costs may need to be borne by the Crown.</p>	<p>Reframe Objective 3 to clarify who the hunting community is and provide for some costs (likely administrative) to fall upon the Crown.</p>
Objective 4	<p>Support the intent, however the objective currently doesn’t emphasize the right outcome.</p> <p>The outcome reads as if hunters are still only being recognized as ‘tools’ for control as per the</p>	<p>Amend to ‘Build or maintain hunter and community involvement to manage the herd, increase the value of the herd and enhance conservation outcomes that promote the health of indigenous species’.</p>

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

<b>Strategies</b>		
<b>Use a range of tools to manage the Fiordland Wapiti Herd of Special Interest and improve the hunting experience.</b>		
<b>Commentary</b>		
Delegations should be assigned to groups and organisations with the right skills.		
The Fiordland Wapiti Foundation possesses the expertise required to implement and manage the HOSI and operational plan, having demonstrated consistent success in this area over the past two decades.		
Support will no doubt be needed with administration and therefore be delegated to the Game Animal Council who hold the necessary and relevant skills.		
<b>General</b>		
	<b>Position</b>	<b>Recommendation</b>
1.1	<p>This section needs to be reframed to increase the recognition of the values of the herd.</p> <p>The term 'wapiti control' needs to be removed as this is a management plan and not a control plan.</p> <p>The strong focus on controlling animals (dead deer) puts the onus on short term outcomes. The Fiordland Wapiti herd is a highly valued resource that requires ongoing sustainable management to</p>	The Strategies need to focus on herd health and the habitat through sustainable management.

	<p>continue to build upon the success of the FWF.</p> <p>Game animal management is a long-term approach; it is not a one and done 'control' approach.</p>	
1.2	Support in principle with amendments.	<p>Amend overarching statement to 'Enable recreational hunting and coordinate and manage herd management hunts, and professional management to selectively remove wapiti in a way that:</p> <p>Amend 1.2 a) protects and enhances the wapiti hunting experience.</p>
<b>Recreational hunting</b>		
	<b>Position</b>	<b>Recommendation</b>
1.3	This currently happens through DOC Hunting Permits; therefore, it would be an administrative change.	
1.4	This currently happens through DOC Hunting Permits; therefore, it would be an administrative change.	
1.5	Support as the status quo for access to wapiti hunting will be maintained as far as practicable.	
1.6	<p>Refinement requirement.</p> <p>There is too much ambiguity by allowing hunters to focus on animals with fewer wapiti-like traits as this can easily be manipulated.</p> <p>The management agency, the Fiordland Wapiti Foundation should be the ones managing the animals with fewer wapiti-like traits.</p>	Amend 1.6 to allow for the harvest of cows with fewer wapiti-like traits, but remove the reference to bulls.

1.7	<p>Support in principle with amendments to terminology appropriate for a HMP and in line with the Game Animal Council Act 2013.</p> <p>The term ‘control activities’ should be removed as this is a management plan and not a control plan.</p>	<p>Amend 1.7 to, Seek to charge fees to hunt Fiordland wapiti to cover costs associated with managing the Fiordland Wapiti Herd of Special Interest, such as management activities, hunter education, and advertising.</p>
1.8	Support in principle.	
<b>Commercial recovery and professional control activities</b>		
	<b>Position</b>	<b>Recommendation</b>
1.9	<p>1.9 Support with amendments. HOSI changes the status of game animals from ‘pests’ to be controlled for their harmful effects, to ‘valued introduced species’ to be managed for both their values and their impacts</p> <p>1.9 a, b, c, d) Support with amendments. HOSI changes the status of game animals from ‘pests’ to be controlled for their harmful effects, to ‘valued introduced species’ to be managed for both their values and their impacts.</p> <p>1.9 c) This sentence is ambiguous and provides for high levels of misinterpretation. Recent incentivization schemes administered through the DOC have had perverse outcomes with helicopter operators being incentivised to shoot females in Fiordland. The operators have then flown back into Fiordland to shoot the males therefore defeating the purpose of the incentivization scheme; unless</p>	<p>Amend 1.9 to ‘Use authorised commercial recovery and professional operators as part of Fiordland wapiti management, applying the following criteria: contribute to herd management activities’.</p> <p>1.9 a, b, c, d) remove all terminology associated with professional control activities and replace with professional management activities.</p> <p>1.9 c) Amend to clarify the purpose and meaning.</p>

	the purpose was to remove as many deer as possible.	
<b>Monitoring</b>		
<b>Commentary</b>		
<p>Management including monitoring should relate back to the objectives of the HMP; they should be efficient and effective i.e. they should not be costly and provide little value.</p> <p>Objectives should direct operational activity, and monitoring should inform management responses aligned with an adaptive management framework.</p> <p>Overdue bureaucracy and draconian approaches should be avoided as they are not efficient and do not result in tangible outcomes.</p>		
	<b>Position</b>	<b>Recommendation</b>
2.1	<p>Support with amendments.</p> <p>2.1 a) The use of Faecal pellet counts serves no purpose other than determining presence/absence. This method is subjective and do not truly reflect deer impacts. Monitoring should only reflect the impact deer have on the environment.</p> <p>2. 1 b) Submit that the absence of the Game Animal Council in 2.1 b to be rectified to include this Statutory Entity whose expertise lie in the management of game animals and the removal of Conservation Boards as they do not have a statutory function for game animal management, and involvement in sustainable game animal management is outside their statutory functions.</p> <p>It is likely that DOC will provide sufficient representation of conservation values when discussing new monitoring methods, tools and technologies.</p>	<p>Amend 2.1 a) Remove faecal pellet counts.</p> <p>Amend 2.1b) Add the Game Animal Council and remove Conservation Boards.</p> <p>Amend 2.1 b) for provisions to be made for new monitoring tools and methods and the need to validate to ensure consistency of results.</p> <p>Submit that 2.1 c) is amended from ‘control targets’ to ‘herd management’ as game animals are a valued introduced species.</p>

	The methods to monitor populations and herd health should not be limited, as technology is rapidly evolving. If new monitoring tools are developed, they should be validated.	
2.2	<p>Support with amendments.</p> <p>There is a risk that if the standards are set by the DOC then the standards will reflect a pest control framework as is the DOC's mandate.</p> <p>Standards and methods need to be industry best practice, and this may mean looking at standards and methods used in countries who have longstanding involvement and understanding in game animal management developed over many years.</p>	Amend 2.2 to, Undertake ecological monitoring in accordance with best practice methods and standards.
<b>Research</b>		
	<b>Position</b>	<b>Recommendation</b>
2.4	Support	
2.5	Support	
2.6	One of the main purposes of the HMP is to manage the herd for its hunting value. Therefore, research to better understand the management of the HOSI should also investigate the hunter experience.	Amend 2.6 to, Undertake relevant research, including research related which may related to, but is not limited to, the: a) spread, behaviours and effects of Fiordland wapiti on indigenous flora, and how this compares with that of other deer species; b) movement patterns and habitat utilization of Fiordland wapiti within the Wapiti; c) potential impacts of aerial hunting on the movements and habitat

		utilization of Fiordland wapiti and d) hunter harvest and satisfaction.
<b>Foster partnerships and community stewardship</b>		
	<b>Position</b>	<b>Recommendation</b>
3.1	Support with amendments.  The inclusion of the words ‘associated with Fiordland wapiti’ may limit the scope as to whom partnerships may be entered into with, therefore limiting the success of this plan.	Amend 4.1 to remove the words ‘associated with Fiordland wapiti’.
3.2	Support	
3.3	Support	
<b>Stewardship</b>		
	<b>Position</b>	<b>Recommendation</b>
3.4	Support with amendments to reflect the intent, language and framing of the Game Animal Council Act 2013, not the language and framing of the Wild Animal Control Act 1977.	Amend 4.4 to, Provide a range of opportunities for the hunting community and other interested parties to actively contribute to Fiordland wapiti management.
3.5	Support	
3.6	Support	
3.7	Support with amendments to make 4.7 more action orientated and to reflect the intent, language and framing of the Game Animal Council Act 2013, not the language and framing of the Wild Animal Control Act 1977.	Amend 4.7 to, Provide a range of opportunities for the hunting community and other interested parties to actively contribute to Fiordland wapiti herd management.
3.8	Support	
3.9	Support	
3.10	Support	
<b>Undertake annual operational planning and reporting on management activities.</b>		
<b>Commentary</b> The annual operational plan should serve as a flexible management tool that inspires innovation, and this HOSI presents an opportunity not only to manage		

<p>Fiordland wapiti but also to advance deer management techniques in New Zealand.</p> <p>The annual operational plan must remain separate from the HMP. This document needs to be an adaptive management plan that is developed by the implementer of the Herd of Special Interest, in this case the Fiordland Wapiti Foundation.</p>		
<p><b>Annual operational plan</b></p>		
	<p><b>Position</b></p>	<p><b>Recommendation</b></p>
<p>4.1</p>	<p>Support with amendments. HOSI changes the status of game animals from ‘pests’ to be controlled for their harmful effects, to ‘valued introduced species’ to be managed for both their values and their impacts.</p>	<p>Submit that all references to ‘control operations’ be replaced with ‘management operations’.</p>
<p><b>Annual report</b></p>		
<p><b>Commentary</b></p> <p>Whilst I support financial transparency, financial reporting should not be a requirement within the Herd Management Plan. Financial reporting should be a requirement of the Annual Operational Plan meaning that operations can remain adaptable.</p>		
	<p><b>Position</b></p>	<p><b>Recommendation</b></p>
<p>4.2</p>	<p>Support with amendments. HOSI changes the status of game animals from ‘pests’ to be controlled for their harmful effects, to ‘valued introduced species’ to be managed for both their values and their impacts.</p> <p>4.2 d) Support with amendments.</p>	<p>Submit that all references to ‘control’ be replaced with ‘management’.</p> <p>Submit that provisions are made within 4.2d) to protect commercial sensitivities if private businesses or philanthropists wish to partner and donate.</p>
<p>4.4</p>	<p>Oppose in part.</p>	<p>Delete 4.4</p>

	<p>It is yet to be determined whether the Game Animal Council or the Department of Conservation will be the statutory management entity for HOSI implementation, therefore the provision is unnecessary and creates undue bureaucracy.</p> <p>Note: The current system hasn't worked; generally, there is a lack of trust between the hunting community and the DOC and therefore the powers to administer the plan should be delegated to the GAC.</p>	<p>Clear guidance is needed on whether HOSI falls under DOC or GAC legislation and who the administrative entity is.</p>
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If you have any queries relating to this submission, please do not hesitate to contact me directly.

Yours sincerely



**Tim Gale**

s9(2)(a)

s9(2)(a)

# Tim Gale - Hunting & Fishing Napier

Submission Details

## Eirwen Harris Mitchell

---

**From:** Tim Gale s9(2)(a)  
**Sent:** Monday, 8 December 2025 8:55 pm  
**To:** wapitiHOSIHMP  
**Subject:** Draft Herd Management Plan – Fiordland Wapiti HOSI  
**Attachments:** Submission Draft Herd Management Plan FWF HOSI - HF Napier.pdf  
**Categories:** Green category

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

*Best regards*

Tim Gale

Manager / Co-owner  
Hunting & Fishing Napier

P. s9(2)(a)

E. s9(2)(a)

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



HUNTING  
FISHING  
DIVING  
CAMPING  
TRAMPING  
CLOTHING

**8 December 2025**

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

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

### **Draft Herd Management Plan – Fiordland Wapiti HOSI**

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#### **Hunting & Fishing Napier**

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

6. Fiordland wapiti are the driver of many Hawke's Bay hunters to venture to Fiordland with friends and family on what is considered by some as the holy grail of hunting in New Zealand.
7. The lead up to the Wapiti ballot being drawn is a much anticipated event with hunters in the Hawke's Bay and across New Zealand, and social media comes alive with talk about the blocks people secured, access routes, and hunting opportunities etc.
8. The hunting of Fiordland wapiti is a popular activity for hunters of Hawke's Bay and the revenue generated from the hunting category within Hunting & Fishing Napier is significant with many hunters purchasing quality hunting and camping equipment for their sojourn south.

## **Overview**

9. As a hunting, fishing, outdoor and sporting goods retailer, Hunting & Fishing Napier supports changes to legislation that will improve the sustainable management of game animals and hunting and increase hunting opportunities whilst supporting ongoing conservation initiatives throughout New Zealand.
  10. Hunting & Fishing Napier supports and works closely with the hunting sector and recognizes the immense amount of positive work organisations such as the Game Animal Council, New Zealand Deerstalkers Association, Fiordland Wapiti Foundation, Central North Island Sika Foundation and Tahr Foundation do to ensure that:
    - a. The activity of hunting is encouraged,
    - b. Game animals are sustainably managed, and
    - c. Conservation outcomes are improved.
  11. The hunting sector is the single largest contributor to the management of game animal populations and therefore should be empowered to enable increased game animal management initiatives throughout New Zealand.
- 
12. The greatest example of this is the internationally recognised Fiordland Wapiti Foundation (FWF), who selectively shoot 1,000+ deer consistently year on year from Fiordland and also undertake significant other conservation initiatives.

13. In undertaking this work, through implementing game animal management principles, the FWF has:
- a. Increased the value of the Wapiti hunting experience,
  - b. Increased the value of Fiordland National Park as a destination,
  - c. Increased the value of Wapiti deer,
  - d. Increased the economic value to the Southland community and beyond.
  - e. Improved the conservation outcomes in the Wapiti Area of Fiordland National Park.
14. Hunting & Fishing Napier customers travel from Hawke’s Bay and internationally to hunt Fiordland wapiti. These hunters make significant investments in hunting equipment and drive regional economic growth.
15. The work of the FWF has all been at no cost to the taxpayer; the work is paid for by hunters (domestic and international) and commercial partnerships.
16. This is achieved through the annual ballot providing hunters with a world-class hunting experience during the wapiti bugle.
17. Management operations are funded through the proceeds of the ballot and other sources that removes on average over a 1000 red, hybrid, female and lower quality Wapiti from the Wapiti area annually.
18. Wapiti herd numbers are maintained at a level that enables and promotes the regeneration of browsed indigenous plants.
19. A major predator-trapping initiative runs at no cost to the taxpayer across remote Fiordland valleys to control stoats and rats, and support species like kiwi, who and kea.
- 
20. Hunting & Fishing Napier supports initiatives that increase the quality, value and recognition of game animals and hunting across New Zealand and the designation of a HOSI will continue to raise the profile of this species.

21. Hunting & Fishing Napier supports initiatives that promote hunters, hunter values and the contribution that hunters make across New Zealand.
22. Hunting & Fishing Napier supports the designation and implementation of Herds of Special Interest (HOSI).
23. Hunting & Fishing Napier supports the concept of HOSI as an important modern day legislative tool for the sustainable management of Fiordland wapiti and for recognising game animals as valued introduced species that should be managed for both their benefits and their impacts.
24. Hunting & Fishing Napier supports the concept of HOSI because it helps ensure these species—and the hunting of them—remain a valued part of New Zealand’s social fabric.
25. Hunting & Fishing Napier supports the concept of HOSI because it reinforces the value of hunting and strengthens the role of hunters and other entities in responsible game animal management.
26. Hunting & Fishing Napier submits that the HOSI framework is critical for aligning hunting, community, and conservation values at place, enabling improved outcomes for game animals, hunters, recreational users, and conservationists, acknowledging that these groups frequently overlap.
27. Hunting & Fishing Napier submits that the HOSI framework provides an opportunity to drive economic growth by enabling more active promotion and management of the herd, increasing value recognition of the herd, and realisation of the associated benefits.
28. Hunting & Fishing Napier has reviewed the Draft Herd Management Plan (the draft HMP) and recommends amendments to the draft Plan to reflect the intent of a Herd Management Plan so that it aligns with the intent of the Game Animal Council Act and the value associated with Fiordland wapiti and the hunting of wapiti.

<b>1 Introduction</b>					
<b>Overriding considerations</b>					
<p><b>Commentary</b></p> <p>Whilst the draft Plan lists what the Overriding considerations are, there is no analysis or explanation providing specific details of what the Overriding considerations are and how this Plan would be consistent with specific Considerations that may or may not be found in existing policies and strategies.</p> <p>This presents a risk to the designation of functions to the GAC, the adoption of the plan and in the future, the implementation of the Plan.</p>					
<b>2 Values and key context</b>					
	<table border="1"> <thead> <tr> <th><b>Position</b></th> <th><b>Recommendation</b></th> </tr> </thead> <tbody> <tr> <td> <p>As the current drafting stands, the framing of the draft HMP is that of a control plan for conservation outcomes.</p> <p>First and foremost, it is a Herd Management Plan therefore the sections need to be framed in a more fitting structure. The herd should be the focus of the plan, and the focus of the plan should be the herd.</p> <p>A HMP is a paradigm shift from a control plan. It needs to be a game animal management plan therefore recognising the values of the herd first, and the need to manage to herd to enable both hunting and conservation outcomes.</p> <p>There needs to be a clear delineation between culture, heritage, community and stewardship.</p> <p>Additionally, there is a very limited focus on community values, and in particular the</p> </td> <td> <p>Frame the draft plan in the following order:</p> <ol style="list-style-type: none"> <li>1. Herd and hunting values</li> <li>2. Conservation / stewardship values</li> <li>3. Mana whenua values</li> <li>4. Community values</li> </ol> <p>Remove all reference to control and replace with management or adaptive management.</p> <p>Separate and redraft the sections to better outline the values.</p> <p>More emphasis is placed on the relationship between hunters and hunting of the herd and the</p> </td> </tr> </tbody> </table>	<b>Position</b>	<b>Recommendation</b>	<p>As the current drafting stands, the framing of the draft HMP is that of a control plan for conservation outcomes.</p> <p>First and foremost, it is a Herd Management Plan therefore the sections need to be framed in a more fitting structure. The herd should be the focus of the plan, and the focus of the plan should be the herd.</p> <p>A HMP is a paradigm shift from a control plan. It needs to be a game animal management plan therefore recognising the values of the herd first, and the need to manage to herd to enable both hunting and conservation outcomes.</p> <p>There needs to be a clear delineation between culture, heritage, community and stewardship.</p> <p>Additionally, there is a very limited focus on community values, and in particular the</p>	<p>Frame the draft plan in the following order:</p> <ol style="list-style-type: none"> <li>1. Herd and hunting values</li> <li>2. Conservation / stewardship values</li> <li>3. Mana whenua values</li> <li>4. Community values</li> </ol> <p>Remove all reference to control and replace with management or adaptive management.</p> <p>Separate and redraft the sections to better outline the values.</p> <p>More emphasis is placed on the relationship between hunters and hunting of the herd and the</p>
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	values of hunters and the relationship they hold with the Wapiti herd and the Fiordland National Park.	benefits that arise from this relationship, i.e. social, health & wellbeing, economic and conservation.
<b>3 Objectives and Strategies</b>		
<p><b>Commentary</b></p> <p>Hunting &amp; Fishing Napier supports having Objectives and Strategies, however further refinement is needed to provide adequate direction and feedback loops.</p> <p>The plan should be structured so that values inform the objectives, and objectives inform the strategies. This orderly and repeatable flow provides a sound basis for clear and consistent monitoring of the HMP.</p> <p>This is primarily a Herd Management Plan (HMP), not a control plan, therefore we submit that the Objectives need to be ordered to reflect the Game Animal Council Act, Section 16(1) being ‘of special interest to hunters, managed for hunting purposes and consistent with overriding considerations’.</p> <p>The primary function of the draft HMP is the management of the herd and resulting from that will be conservation outcomes therefore objectives should flow in that order.</p>		
	<b>Position</b>	<b>Recommendation</b>
Objective 1	<p>Support with amendments.</p> <p>This is primarily a Herd Management Plan, not a control plan.</p>	<p>Submit that Objective 1 be reframed to be should only relate to wapiti impacts and their management.</p> <p>Replace the word ‘restoring’ to ‘improving’ as restoring ecological process is ambiguous and unachievable i.e. what stage is restoration aiming for; prehuman, when Moa existed etc.?</p>
Objective 2	Support.	
Objective 3	<p>Support with amendments.</p> <p>Seeking to recover costs from the hunting community is</p>	Reframe Objective 3 to clarify who the hunting community is and provide for some costs (likely

	<p>ambiguous. Is the hunting community recreational hunters or does it include Wild Animal Recovery Operations?</p> <p>This framing is potentially limiting as cost recovery may come from other avenues.</p> <p>There are benefits to the Crown and wider New Zealand through successful herd management and the increased value of wapiti, therefore some costs may need to be borne by the Crown.</p>	<p>administrative) to fall upon the Crown.</p>
Objective 4	<p>Support the intent, however the objective currently doesn't emphasize the right outcome.</p> <p>The outcome reads as if hunters are still only being recognized as 'tools' for control as per the Wild Animal Control Act 1977 language.</p>	<p>Amend to 'Build or maintain hunter and community involvement to manage the herd, increase the value of the herd and enhance conservation outcomes that promote the health of indigenous species'.</p>
Objective 5	Support	
Objective 6, 7, 8	<p>Support in principle, however these can be amalgamated into 'Adaptive Management' which entails Objectives 6, 7, 8.</p>	<p>Reframe into a singular Objective; Apply an adaptive management framework based on monitoring and research to implement the Plan.</p>
Objective 9	<p>Oppose as this is not an Objective, it is an administrative procedure.</p>	<p>The requirement to report should be further down the HMP.</p>

<b>Strategies</b>
<b>Use a range of tools to manage the Fiordland Wapiti Herd of Special Interest and improve the hunting experience.</b>
<b>Commentary</b>
Delegations should be assigned to groups and organisations with the right skills.

The Fiordland Wapiti Foundation possesses the expertise required to implement and manage the HOSI and operational plan, having demonstrated consistent success in this area over the past two decades.

Support will no doubt be needed with administration and therefore be delegated to the Game Animal Council who hold the necessary and relevant skills.

<b>General</b>		
	<b>Position</b>	<b>Recommendation</b>
1.1	<p>This section needs to be reframed to increase the recognition of the values of the herd.</p> <p>The term ‘wapiti control’ needs to be removed as this is a management plan and not a control plan.</p> <p>The strong focus on controlling animals (dead deer) puts the onus on short term outcomes. The Fiordland Wapiti herd is a highly valued resource that requires ongoing sustainable management to continue to build upon the success of the FWF.</p> <p>Game animal management is a long-term approach; it is not a one and done ‘control’ approach.</p>	<p>The Strategies need to focus on herd health and the habitat through sustainable management.</p>
1.2	<p>Support in principle with amendments.</p>	<p>Amend overarching statement to ‘Enable recreational hunting and coordinate and manage herd management hunts, and professional management to selectively remove wapiti in a way that:</p> <p>Amend 1.2 a) protects and enhances the wapiti hunting experience.</p>

<b>Recreational hunting</b>		
	<b>Position</b>	<b>Recommendation</b>
1.3	This currently happens through DOC Hunting Permits; therefore, it would be an administrative change.	
1.4	This currently happens through DOC Hunting Permits; therefore, it would be an administrative change.	
1.5	Support as the status quo for access to wapiti hunting will be maintained as far as practicable.	
1.6	Refinement requirement.  There is too much ambiguity by allowing hunters to focus on animals with fewer wapiti-like traits as this can easily be manipulated.  The management agency, the Fiordland Wapiti Foundation should be the ones managing the animals with fewer wapiti-like traits.	Amend 1.6 to allow for the harvest of cows with fewer wapiti-like traits, but remove the reference to bulls.
1.7	Support in principle with amendments to terminology appropriate for a HMP and inline with the Game Animal Council Act 2013.  The term 'control activities' should be removed as this is a management plan and not a control plan.	Amend 1.7 to, Seek to charge fees to hunt Fiordland wapiti to cover costs associated with managing the Fiordland Wapiti Herd of Special Interest, such as management activities, hunter education, and advertising.
1.8	Support in principle.	
<b>Commercial recovery and professional control activities</b>		
	<b>Position</b>	<b>Recommendation</b>
1.9	1.9 Support with amendments. HOSI changes the status of game animals from 'pests' to be controlled for their harmful effects, to 'valued introduced	Amend 1.9 to 'Use authorised commercial recovery and professional operators as part of Fiordland wapiti

	<p>species' to be managed for both their values and their impacts</p> <p>1.9 a, b, c, d) Support with amendments. HOSI changes the status of game animals from 'pests' to be controlled for their harmful effects, to 'valued introduced species' to be managed for both their values and their impacts.</p> <p>1.9 c) This sentence is ambiguous and provides for high levels of misinterpretation. Recent incentivization schemes administered through the DOC have had perverse outcomes with helicopter operators being incentivised to shoot females in Fiordland. The operators have then flown back into Fiordland to shoot the males therefore defeating the purpose of the incentivization scheme; unless the purpose was to remove as many deer as possible.</p>	<p>management, applying the following criteria: contribute to herd management activities'.</p> <p>1.9 a, b, c, d) remove all terminology associated with professional control activities and replace with professional management activities.</p> <p>1.9 c) Amend to clarify the purpose and meaning.</p>
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**Monitoring**

**Commentary**

Management including monitoring should relate back to the objectives of the HMP; they should be efficient and effective i.e. they should not be costly and provide little value.

Objectives should direct operational activity, and monitoring should inform management responses aligned with an adaptive management framework.

Overdue bureaucracy and draconian approaches should be avoided as they are not efficient and do not result in tangible outcomes.

	<b>Position</b>	<b>Recommendation</b>
2.1	Support with amendments.	

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

	methods used in countries who have longstanding involvement and understanding in game animal management developed over many years.	
<b>Research</b>		
	<b>Position</b>	<b>Recommendation</b>
2.4	Support	
2.5	Support	
2.6	One of the main purposes of the HMP is to manage the herd for its hunting value. Therefore, research to better understand the management of the HOSI should also investigate the hunter experience.	Amend 2.6 to, Undertake relevant research, including research related which may related to, but is not limited to, the: a) spread, behaviours and effects of Fiordland wapiti on indigenous flora, and how this compares with that of other deer species; b) movement patterns and habitat utilization of Fiordland wapiti within the Wapiti; c) potential impacts of aerial hunting on the movements and habitat utilization of Fiordland wapiti and d) hunter harvest and satisfaction.
<b>Foster partnerships and community stewardship</b>		
	<b>Position</b>	<b>Recommendation</b>
3.1	Support with amendments.  The inclusion of the words 'associated with Fiordland wapiti' may limit the scope as to whom partnerships may be entered into with, therefore limiting the success of this plan.	Amend 4.1 to remove the words 'associated with Fiordland wapiti'.
3.2	Support	
3.3	Support	

<b>Stewardship</b>		
	<b>Position</b>	<b>Recommendation</b>
3.4	Support with amendments to reflect the intent, language and framing of the Game Animal Council Act 2013, not the language and framing of the Wild Animal Control Act 1977.	Amend 4.4 to, Provide a range of opportunities for the hunting community and other interested parties to actively contribute to Fiordland wapiti management.
3.5	Support	
3.6	Support	
3.7	Support with amendments to make 4.7 more action orientated and to reflect the intent, language and framing of the Game Animal Council Act 2013, not the language and framing of the Wild Animal Control Act 1977.	Amend 4.7 to, Provide a range of opportunities for the hunting community and other interested parties to actively contribute to Fiordland wapiti herd management.
3.8	Support	
3.9	Support	
3.10	Support	
<b>Undertake annual operational planning and reporting on management activities.</b>		
<b>Commentary</b>		
<p>The annual operational plan should serve as a flexible management tool that inspires innovation, and this HOSI presents an opportunity not only to manage Fiordland wapiti but also to advance deer management techniques in New Zealand.</p> <p>The annual operational plan must remain separate from the HMP. This document needs to be an adaptive management plan that is developed by the implementer of the Herd of Special Interest, in this case the Fiordland Wapiti Foundation.</p>		
<b>Annual operational plan</b>		
	<b>Position</b>	<b>Recommendation</b>
4.1	Support with amendments. HOSI changes the status of game animals from 'pests' to be controlled for their harmful effects, to 'valued introduced species' to be managed for both their values and their impacts.	Submit that all references to 'control operations' be replaced with 'management operations'.

<b>Annual report</b>		
<p><b>Commentary</b>          Whilst we support financial transparency, financial reporting should not be a requirement within the Herd Management Plan. Financial reporting should be a requirement of the Annual Operational Plan meaning that operations can remain adaptable.</p>		
	<b>Position</b>	<b>Recommendation</b>
4.2	<p>Support with amendments. HOSI changes the status of game animals from ‘pests’ to be controlled for their harmful effects, to ‘valued introduced species’ to be managed for both their values and their impacts.</p> <p>4.2 d) Support with amendments.</p>	<p>Submit that all references to ‘control’ be replaced with ‘management’.</p> <p>Submit that provisions are made within 4.2d) to protect commercial sensitivities if private businesses or philanthropists wish to partner and donate.</p>
4.4	<p>Oppose in part.</p> <p>It is yet to be determined whether the Game Animal Council or the Department of Conservation will be the statutory management entity for HOSI implementation, therefore the provision is unnecessary and creates undue bureaucracy.</p> <p>Note: The current system hasn’t worked; generally, there is a lack of trust between the hunting community and the DOC and therefore the powers to administer the plan should be delegated to the GAC.</p>	<p>Delete 4.4</p> <p>Clear guidance is needed on whether HOSI falls under DOC or GAC legislation and who the administrative entity is.</p>

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

Yours sincerely

A handwritten signature in blue ink that reads "Tim Gale". The signature is written in a cursive style and is set against a light blue rectangular background.

**Tim Gale**  
Co-owner / Manager  
Hunting & Fishing Napier

s9(2)(a)

s9(2)(a)

# Stuart Gerritsen

Submission Details

# **1. Position Statement**

I support the Herd Management Plan (HMP) for the Fiordland Wapiti Herd of Special Interest in principle. However, I believe several key amendments are required to ensure the plan is practical, effective, and aligned with the unique values and needs of the Fiordland Wapiti herd.

## **2. Values and Significance of the Fiordland Wapiti Herd**

The Herd Management Plan must reflect the distinct values of the Fiordland Wapiti herd and the deep cultural, recreational, and environmental importance this herd holds.

Personally, I value Fiordland Wapiti because of:

- Their rich heritage and the legacy they represent.
- The unique combination of Fiordland wilderness and wapiti hunting—an experience unmatched elsewhere.
- The adventure, challenge, and personal growth that comes from hunting in Fiordland.

- The individuality and uniqueness of wapiti trophies.
- The health and wellbeing benefits of spending time in such a remote and natural environment.
- The deep connection to nature that Fiordland fosters.
- The opportunity to share these experiences with family and pass this legacy on to future generations.

These values must be recognised and preserved through a management approach that supports hunters, communities, and conservation outcomes.

### **3. Social and Community Outcomes**

The Herd Management Plan should explicitly support:

- Hunter-led and community-driven management of the Fiordland Wapiti herd.
- Positive social, cultural, and economic outcomes for local communities, volunteers, and participants involved in Wapiti management.

Community stewardship has been central to the herd's success and must remain at the heart of HOSI.

## **4. Funding Structure**

All funding intended for the Fiordland Wapiti Herd of Special Interest must be transferred directly from the funding source to the implementing organisation—in this case, the Fiordland Wapiti Foundation.

Funding should not be routed through DOC, GAC, or any other government body for discretionary redistribution. A direct funding pathway ensures transparency, efficiency, and continuity of on-the-ground management.

## **5. Keep Financial Reporting Simple**

Financial reporting requirements should not be included within the Herd Management Plan.

Administrative burden should be minimised so that resources are directed towards on-the-ground herd management, not bureaucracy.

## **6. Operational Plan Structure**

The Operational Plan should be a flexible, adaptive tool that:

- Encourages innovation and efficiency in deer management.
- Builds on New Zealand’s position as a leader in wapiti and deer management techniques.
- Allows the Fiordland Wapiti Foundation—who has successfully delivered herd management for over two decades—to design and adapt the plan as the implementing body.

The Operational Plan must remain separate from the HMP, with the Fiordland Wapiti Foundation responsible for its development and execution.

## **7. Vegetation and Environmental Monitoring**

Monitoring is essential for adaptive management and must be tied directly to whether objectives in the HMP are being achieved.

Monitoring approaches should be:

- Efficient, effective, and fit for purpose.
- Free from unnecessary bureaucracy and overly prescriptive or costly methodologies.
- Focused on measuring actual deer impacts on vegetation and environment.

Faecal pellet counts should not be used, as they are subjective and do not accurately reflect impact or ecological outcomes.

## **8. Roles, Responsibilities, and Delegations**

Delegated responsibilities should be assigned to groups with the appropriate expertise.

The Fiordland Wapiti Foundation is the only organisation with the proven capability to implement and manage the Wapiti HOSI and associated operational plan, with more than twenty years of successful management outcomes.

Clear guidance is also required regarding whether governance of the HOSI sits under DOC or GAC legislation to remove ambiguity.

## **9. Setting the Correct Tone for HOSI**

A Fiordland Wapiti HOSI must be framed around active management, not “control.”

I request that all references to “control” be removed from the HMP and replaced with “management.”

The language of “control” reflects outdated and ineffective approaches to deer management in New Zealand, whereas “management” reflects the collaborative, sustainable, and values-based approach needed for a successful Wapiti HOSI.

Thank you for the opportunity to submit.

I strongly support a well-designed, community-involved, and sustainably managed Wapiti HOSI that protects both the Fiordland environment and the unique Wapiti herd for future generations.

# Allan Gillespie

Submission Details

## Eirwen Harris Mitchell

---

**From:** thatfly s9(2)(a)  
**Sent:** Sunday, 7 December 2025 4:07 pm  
**To:** wapitiHOSIHMP  
**Subject:** I support the hosi. We need the deer managed by the people who hunt them.  
Allan Gillespie.

**Importance:** High

**Categories:** Green category

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s9(2)(a)

# Douglas Gordon - NZDA Southland Branch

Submission Details



## **Southland Branch *the Founding Branch Est 1937***

***PoBox 1588 Invercargill***

***e-mail*** s9(2)(a)

### **Herd of Special Interest Wapiti (HOSI)**

#### **Hon James Meager, Minister for Hunting and Fishing**

Please find below the Southland Branch of The New Zealand Deerstalkers Assn submission on Herd of Special Interest Wapiti (HOSI).

The Southland Branch strongly supports the proposal to establish a Herd of Special Interest for Wapiti in their current habitat in Fiordland. It also supports the detailed submission of the NZDA National Office on this matter.

The Southland Branch has been a strong supporter of retaining a Wapiti Herd in Fiordland for hunting ever since moves were started to reduce and or remove the herd. Our members have hunted the herd even before the NZDA existed. One of our founding members (Dr G. B. Orbell) in his exploration trips rediscovered the Takahe in 1948. The Branch members besides hunting have a strong interest in conserving the wildlife of the area, and New Zealand in general. We believe there can be room for conservation of the natural environment and game animals at the same time with good management.

Thus, we support the Fiordland Wapiti Foundation in what they have achieved so far in conserving the Wapiti for trophy hunting while improving the vegetation, and wildlife of the area. The Fiordland Wapiti Foundation achieving better conservation results for this area than some other parts of the park are achieving. Further this has been achieved at little cost to the Dept of Conservation, who are stretched for funds. Running 500 predator traps must be a big help to the wildlife, who would maintain them without the Foundation? Conservation is the better of for the presence of the Fiordland Wapiti Foundation in the area.

Then there is an added bonus in that the Foundation has taken over the hut maintenance in the area, further saving Government funds.

So, we see the management plan for the Wapiti and the Wapiti area as a win for all parties.

Thanks for asking for these submissions on what we consider to be a good development for all. Looking forward to the management plan progressing with interest.

Regards

Douglas Gordon

Executive Member Southland NZDA

# Trev Gratton - Lower North Island Red Deer Foundation

Submission Details

## Eirwen Harris Mitchell

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

**Categories:** Green category

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Kia ora koutou,

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

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

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

Ngā mihi nui

Trev Gratton  
Owner/Operator

[s9(2)(a)]



# Lower North Island Red Deer Foundation (Inc)

**Est 2016**

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

**From: Lower North Island Red Deer Foundation (LNIRDF)**

**Date: 8<sup>th</sup> December 2025**

### 1. Introduction

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

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

Our kaupapa is simple:

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

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

### 2. Overall Position

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

However, we believe the plans must:

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

### 3. Key Submission Points

#### 3.1 Recognition of Recreational Hunting as a Primary Management Tool

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

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

We recommend the plans include:

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

### 3.2 Partnership with Iwi, DOC, and Local Communities

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

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

We recommend that:

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

### 3.3 Fair, Transparent, and Accessible Ballot and Access Systems

Access must be fair, equitable, and transparent.

Ballot systems should:

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

### 3.4 Environmental Outcomes and Monitoring

LNIRDF supports clear environmental outcome targets, provided they are:

- realistic

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

Monitoring should combine:

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

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

### 3.5 Opposition to Unnecessary Use of 1080 or Aerial Culling

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

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

Aerial culling should only be used where:

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

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

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

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

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

## 5. Community Impact and Hunting Culture

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

Managing these herds effectively benefits:

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

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

## 6. Recommendations Summary

LNIRDF recommends the final plans:

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

## 7. Conclusion

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

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

We appreciate the opportunity to provide this submission.

Trevor Gratton

Vice-President

s9(2)(a)

# Trev Gratton - NZDA Hutt Valley Branch

Submission Details



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

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## Hutt Valley Branch – New Zealand Deerstalkers Association (Inc)

Contact: Trevor Gratton, Branch President

Email: s9(2)(a)

Mobile: s9(2)(a)

Date: 8<sup>th</sup> December 2025

### 1. Introduction

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

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

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

## 2. General Position

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

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

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

## 3. Protecting What Makes These Herds "Special"

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

When hunters talk about a special herd, we mean:

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

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

Our Recommendation:

Add a specific objective to both plans:

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

And back it up with real indicators:

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

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

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

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

*Recommended wording:*

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

#### **5. Hunter Social Licence Must Be Protected**

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

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

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

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

## 6. Adaptive Management — Not Rigid Targets

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

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

## 7. Fair Access and Equity

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

## 8. Conclusion

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

To succeed, the plans must:

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

Ngā mihi nui,

Hutt Valley Branch

New Zealand Deerstalkers Association

Hutt Valley

Est. 1937



## Eirwen Harris Mitchell

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

**Categories:** Green category

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

Kia ora koutou,

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

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

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

Ngā mihi nui,

**Trev Gratton**  
President



# Liz Hakiwai

Submission Details

## Eirwen Harris Mitchell

---

**From:** Liz Hakiwai s9(2)(a)  
**Sent:** Monday, 8 December 2025 4:41 pm  
**To:** sikaherdofspecialinterest@doc.govt.nz; wapitiHOSIHMP  
**Subject:** SUBMISSIONS

**Categories:** Green category

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

and the Draft Sika Herd of Special Interest (HOSI) Management Plan

I am writing to formally oppose the proposal to grant any form of legal protection to deer herds on New Zealand's conservation land. Deer are an introduced species that continue to cause significant and ongoing ecological damage. Prioritising their management over the health of our native forests, birds, and ecosystems is inconsistent with the core purpose of conservation land under the Conservation Act.

While I do not support the creation of Herds of Special Interest (HOSI) for any deer species, it is clear that the Government intends to progress this policy. Therefore, I am outlining the minimum, non-negotiable conditions that must be included to safeguard our native ecosystems. These conditions are essential to prevent further degradation and to ensure accountability and scientific transparency.

Non-negotiable conditions if the HOSI plans proceed

### 1. Independent ecological monitoring

All ecological monitoring must be carried out by neutral, independent ecologists who have no affiliation—financial or organisational—with hunting groups, commercial interests, or advocacy bodies. Monitoring must focus on vegetation recovery, browse impacts, bird habitat health, and biodiversity indicators.

### 2. Strict five-year review cycles

The HOSI status must be reassessed every five years based on ecological data alone. If monitoring shows declining ecosystem health, or if targets are not met, protections must be revoked without delay.

### 3. Annual public reporting

Comprehensive annual reports must be published, accessible to the public, and include all monitoring data, herd-size estimates, browse-impact maps, and trend analysis. Transparency is essential to ensure public trust and scientific integrity.

### 4. No restrictions on pest-control operations

HOSI designation must not limit or interfere with aerial or ground-based pest control, including 1080 operations, trapping, and poisoning aimed at controlling possums, rats, stoats, goats, pigs, or other pests. Pest-control operations must retain full priority over deer interests.

### 5. Mandatory large-scale deer culls if ecological health declines

If independent monitoring shows vegetation decline, increased browse damage, or reduced biodiversity, immediate and large-scale deer population reductions must be required. Culling must be science-led, not negotiated.

6. HOSI must be scrapped if targets are not met within five years

If ecological benchmarks are not met at the first review point, the entire HOSI designation must be revoked. Conservation land exists to protect native taonga species and ecosystems—not to support introduced game animals.

Conclusion

New Zealand’s native ecosystems are already under severe pressure. Introducing legal protection for any deer herd on conservation land risks undermining decades of conservation work. If the Government chooses to proceed with the HOSI framework despite significant ecological concerns, these non-negotiable conditions are the bare minimum required to protect our native species, uphold scientific integrity, and maintain public confidence in conservation decision-making.

I request that these concerns and conditions be fully considered and incorporated into the final management plans.

I would appreciate acknowledgement of my submissions.

Ngā mihi nui

Liz Hakiwai

s9(2)(a)

s9(2)(a)

s9(2)(a)

# Susan Hall - Upper Waimakariri Rakaia Group

Submission Details

## Eirwen Harris Mitchell

---

**From:** Susan Hall s9(2)(a)  
**Sent:** Saturday, 6 December 2025 9:41 am  
**To:** wapitiHOSIHMP  
**Subject:** HOSI wapiti  
**Attachments:** Dec 25 Submission Wapiti HOSI Managment Plan..pdf

**Categories:** Green category

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Good morning  
Please find attached our submission.

Kind regards  
Susan Hall  
Upper Waimakariri/ Rakaia Group UWRG

## Upper Waimakariri/Rakaia Group



*Craigieburn Range*

### **Submission on Fiordland Wapiti (Herds of Special Interest) Management Plan.**

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

To the Department of Conservation  
Christchurch  
Email: [wapitihosihmp@doc.govt.nz](mailto:wapitihosihmp@doc.govt.nz)

#### **Background**

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

#### **The proposed Fiordland Wapiti HOSI Management Plan (the Plan).**

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

We make the following comments on the Plan:

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

UWRG oppose the precedent that would be set by designating wapiti as a HOSI. If this first HOSI is established, it will pave the way for other herds of pest animals such as chamois, tahr

and pigs to be given special status in other National Parks. Ungulate browsing is damaging forests in our area of Canterbury. Pest animals need to be culled, not given special status.



*Deer Damage in Craigieburn Forest Park 2024*

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

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

**Outcome sought**

UWRG requests that no HOSI in Fiordland be granted, that the proposal be declined in its entirety.

UWRG wishes to be heard in support of this submission.

Date: 6 December 2025

# Susan Hall

Submission Details

## Eirwen Harris Mitchell

---

**From:** Susan Hall s9(2)(a)  
**Sent:** Thursday, 4 December 2025 8:37 am  
**To:** wapitiHOSIHMP  
**Subject:** Wapiti Herds of special interest  
**Attachments:** HOSI submission Dec 2025.pdf

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Please find attached my submission.

Thank you for the opportunity to submit. I wish to be heard if there is a hearing.

Thank you.

s9(2)(a)

s9(2)(a)

s9(2)(a)

Submitter details:

Susan Hall

s9(2)(a)

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

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

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

The concept of giving special status to an introduced pest browser is an oxymoron. Wapiti are incredibly destructive browsers with no natural predators in New Zealand. To allow them to graze in Fiordland National Park is to allow the degradation of our indigenous biodiversity, which is so precious and increasingly endangered.

It effectively allows our National Parks to become reserves for game animals, rather than concentrating on pest removal to protect our indigenous biodiversity.

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

The hunting community regularly compare wapiti browsing with moa, as if they are interchangeable. Moa evolved to co-exist with our divaricating plant species, their teeth clipped the vegetation.

Wapiti have lips and tongues which grasp and rip vegetation. They eat the forest from the ground up, consuming fungi, leaf litter, bark and leaves, rapidly removing the understory as far as they can reach.

The carbon sequestration that normally occurs in an intact forest is replaced by the forest eventually becoming a carbon source. Heavy rainfall events cause flooding and slips and erosion of soil as the forest floor can no longer absorb the rain like a sponge.

General comments on the Management Plan (The Plan)

HOSI on public conservation land such as Fiordland National Park needs to show a benefit for the NZ public. The benefits for the hunters are well explained.

A full assessment is required on the effects of the proposed Plan on the World Heritage status currently held.

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

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

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

The implementation of HOSI could restrict landscape scale predator control in the National Park. There is also the restriction on other users of the National Park to allow safe hunting practices.

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

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

# Annette and Michael Hamblett

Submission Details

## **Submission on Draft herd management plan for proposed Fiordland wapiti Herd of Special Interest**

We are opposed to creating a Fiordland wapiti Herd of Special Interest.

Currently we are hearing reports from across the country of the critical problem introduced browsing animals are having on our indigenous ecosystems. Proposing to give special status to some of these browsers, with a short time frame for consideration and in a national park, and World Heritage Area is unwise.

We saw proof of this when we farmed for 15 years in the Buller region. The damage from introduced species to the bushland surrounding our land, including from browsing and trampling, was clear to see.

Allowing an introduced species like wapiti to be considered of a Herd of Special Interest, when it is actually a pest species, sets a concerning precedent.

We want to see wapiti controlled to a level where they are not having a detrimental impact on the composition of our forests.

We are not convinced the Plan will achieve this. It seems to prioritise hunting over environmental protection. This is risky and could have unintended consequences.

We agree with Forest and Bird's statement that "...If designated, any herd of special interest management plan for a species that is managed for hunting purposes on public conservation land must, as a bottom line, have a robust, achievable, and time-bound ecological goal to protect, preserve, and restore our native ecosystems and clear actions if this is not achieved".

This plan is currently inadequate and should not be rushed through.

### **Comments on the Draft Management Plan**

The plan as it stands does not provide the means to adequately protect the indigenous ecosystems, and their composition, particularly sensitive alpine plants.

It does not clearly and strongly state how the environment will be protected and how progress (or failure) will be measured). It needs to.

Lacking in the Plan is explanation of how:

- indigenous biodiversity will be improved
- loss of native species from their current range will be halted.
- the hunting experience and opportunities will be 'enhanced'
- healthier animals will be produced for hunters

Without more specific environmental targets the Plan must not be finalised. This is essential on public conservation land, even more so in a national park where, under the National

Parks Act 1980, introduced species are to be exterminated, and in a UNESCO World Heritage Area.

There will need to be a full assessment of how World Heritage Area values will be impacted by giving an introduced species a 'Herd of special interest' status in Fiordland.

Clear strategies require good data. We understand this is lacking.

Without knowing how many feral deer are in the area, any success or failure of the Plan cannot be properly assessed. Before the Plan is finalised there needs to be full feral deer count done, followed up by the setting of density targets.

The plan lacks thorough and comprehensive monitoring and enforcement provisions. included. These should be included and paid for by the hunters.

The public needs to know if the Plan is achieving its stated objectives. Monitoring information should become publicly available within a year of monitoring.

Other Park activities and uses, such as other essential work in the National Park, like additional landscape-scale pest control work, and recreation activity, should not be restricted by the Plan.

It is not clear what this will all cost and who pays.

### **Actions sought:**

#### Within the Plan:

Include ecological objectives and strategies that firmly state how the environment will be protected.

State how progress or failure will be measured.

Explain clearly how:

- indigenous biodiversity will be improved
- loss of native species from their current range will be halted
- the hunting experience and opportunities will be 'enhanced'
- healthier animals will be produced for hunters

Add thorough and comprehensive monitoring and enforcement provisions, to be paid for by hunters. (We are opposed to taxpayers funding this.)

Include requirement for monitoring to become publicly available within a year of monitoring.

Make clear other essential work in the National Park, like additional landscape-scale pest control work, and recreation activity, will not be restricted by the Plan.

Provide more detail on costs and who pays.

Before the Plan is finalised:

Carry out a full feral deer count, followed up by the setting of density targets.

Assess impact of Herd of Special Interest on World Heritage Status.

# Demme Hartley

Submission Details

## Eirwen Harris Mitchell

---

**From:** s9(2)(a)  
**Sent:** Sunday, 7 December 2025 11:20 am  
**To:** wapitiHOSIHMP; SikaHerdOfSpecialInterest@doc.govt.nz  
**Subject:** Submission HOSI

**Categories:** Green category

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Demme Hartley

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s9(2)(a)

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

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

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

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

Ngā mihi



# Natalie Hinke

Submission Details

## **Submission on the Draft Herd Management Plan for the Fiordland Wapiti Herd of Special Interest**

To: Department of Conservation, Wapiti HOSI Project Team

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

Date: 24.11.2025

### **Introduction**

Thank you for the opportunity to provide feedback on the Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan (“the Plan”). I recognise that this is a significant, precedent-setting proposal: the Fiordland Wapiti would be among the first formally designated Herds of Special Interest (HOSI) in New Zealand.

I appreciate the time, thought, and collaboration that DOC, the Fiordland Wapiti Foundation (FWF), the Game Animal Council (GAC), iwi partners, and other stakeholders have invested in this process. There is real potential in the Plan to strike a balance between recreational hunting and long-term conservation outcomes — but also important risks and challenges that must be addressed carefully to ensure ecological integrity, Treaty obligations, and social trust.

Below I outline my support for the Plan’s strengths, followed by concerns and recommendations for improvement.

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### **Key Points of Support**

#### **1. Integrated Conservation and Hunting Objectives**

The Plan clearly seeks to “enhance the recreational wapiti hunting experience, including the opportunity to hunt healthier animals,” while also working to “improve natural biodiversity and prevent the loss of native species from their current range.”

This dual-focus — combining hunter benefits with ecological recovery — aligns with the core concept of a HOSI under the Game Animal Council Act.

#### **2. Partnerships and Community Stewardship**

The Plan contemplates a strong role for the Fiordland Wapiti Foundation, building on its existing management experience, including culling, recreational hunting management, predator control, hut / track maintenance, and community engagement.

There is explicit recognition of the cultural and Treaty relationships: Ngāi Tahu and relevant Papatipu Rūnanga are named as key partners.

The strategy of fostering hunter stewardship is positive: empowering hunters to contribute to conservation (e.g., environmental monitoring, predator control) can build both social capital and practical capacity.

#### **3. Adaptive Management & Monitoring**

The Plan adopts an adaptive management framework, with annual operational plans, ecological monitoring (e.g., seedling ratio index, permanent plots), and five-year reviews.

Commitment to publicly accessible reporting increases transparency and accountability.

The Plan acknowledges the challenge of setting fixed density targets in rugged terrain and instead proposes interim, ecologically meaningful indicators (e.g., no net decline in palatable plant size classes) to guide management.

#### 4. Compliance, Enforcement & Legal Clarity

The Plan provides for a compliance framework under the Game Animal Council Act, including enforcement officers, strict permit / authorisation systems, and fines (up to \$5,000) for unauthorised hunting.

The submission process is timely, with a clear consultation window (10 November – 8 December 2025).

The Plan aligns with “overriding considerations” under the GAC Act, including existing conservation policies and strategies (e.g., Fiordland National Park Management Plan, Southland Murihiku CMS).

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### Concerns & Recommendations

While I broadly support the Plan as a promising and pragmatic step forward, I have serious concerns and suggestions that I urge DOC, the Minister, and other stakeholders to address:

#### 1. Ecological Targets & Accountability

- **Concern:** The Plan does not commit to explicit, legally enforceable ecological targets (e.g., specific reductions in browse pressure, threshold metrics for vegetation recovery). Rather, it opts for adaptive, indicator-based monitoring. While understandable, this may weaken accountability.
- **Recommendation:** Introduce **interim ecological performance targets** in the Plan (or at least in the first annual operational plan) that are both meaningful and measurable. Examples could include: a minimum increase in seedling ratio index in monitored plots, a certain percentage reduction in browse on palatable species, or specific recovery trajectories for taonga plant communities. These targets should be included in publicly shared annual reports, so progress (or lack thereof) is transparent.

#### 2. Genetic and Demographic Management

- **Concern:** The Plan recognises “Fiordland wapiti” as “all species of deer in the genus Cervus” within the area, which could include hybrids (wapiti × red deer). Hybridisation raises risks: genetic dilution, demographic instability, or selective hunting pressures could alter the long-term structure of the herd.
- **Recommendation:** Incorporate genetic and demographic monitoring into the Plan’s annual operations. For instance, sample age-structure, sex ratio, and proportion of hybrid individuals. Use these data to guide both harvest strategy (e.g., which animals to prioritise) and professional control, to maintain a healthy, resilient herd that preserves the “special interest” characteristics.

#### 3. Cross-Scale Ecological Risk Assessment

- **Concern:** Although the Plan aims to restore ecological processes and communities, the document lacks detailed risk assessment of negative ecological externalities, particularly in sensitive areas of Fiordland (e.g., rare alpine flora, invertebrates, soil communities).
- **Recommendation:** Undertake a **comprehensive ecological risk assessment** (in collaboration with DOC ecologists, iwi, and independent experts) prior to finalising designation. This assessment should map out high-risk zones (e.g., high-value plant communities), identify thresholds beyond which wapiti impact would be unacceptable, and include a mitigation/management response matrix.

#### 4. Cultural & Treaty Engagement

- **Concern:** While the Plan names Ngāi Tahu and Papatipu Rūnanga, it's not fully clear how their views have shaped specific strategies (e.g., in ecological monitoring, hunting authorisations, cultural values protection). The New Zealand Conservation Authority (NZCA) has raised similar concerns, noting weak Treaty / Treaty-principle expression in the Plan.
- **Recommendation:** Strengthen the Plan's Treaty/Te Tiriti framework by explicitly embedding **co-governance mechanisms**. For example, establish a "Wapiti Management Forum" with iwi, DOC, FWF, and GAC, meeting annually or more frequently to review data, adjust harvest strategy, and co-develop conservation initiatives. Include iwi-led monitoring (rongoā species, mahika kai sites) as part of the operational plan.

#### 5. Compliance, Enforcement & Resource Resourcing

- **Concern:** Enforcement and compliance powers are outlined (fines, officers), but the Plan does not clearly specify how enforcement will be resourced or made visible on the ground. Without capacity, illegal hunting could undermine both ecological and social objectives.
- **Recommendation:** Detail in the Plan (or in the first operational plan) how enforcement will be funded and staffed. Include: the number of enforcement officers or honorary officers, patrol frequency (especially in sensitive or high-use zones), a reporting and whistle-blower mechanism (for community / hunters), and education / communication strategy to ensure hunters understand permit conditions.

#### 6. Funding Transparency & Long-Term Sustainability

- **Concern:** The Plan anticipates a mix of Crown and non-Crown funding, including from hunting (ballots, fees) and FWF. However, how stable this funding will be, and whether it will suffice to sustain monitoring, control, and adaptive management long-term, remains unclear.
- **Recommendation:** Publish a **detailed five-year financial plan** (or budget forecast) alongside the Plan or in the first operational plan. This should include projected revenue sources (hunter fees, other funding), cost breakdown (monitoring, enforcement, control, facilities), and contingency planning if funding falls short. Transparent financials will build trust and ensure the Plan is not only ambitious but deliverable.

## 7. Public & Stakeholder Trust-Building

- **Concern:** Given that this is among the first HOSI designations in NZ, public scrutiny will be high, and trust from non-hunting conservation stakeholders may be fragile (especially from groups like Forest & Bird, which have already voiced concern).
- **Recommendation:** Develop a **communications and engagement plan** to provide regular updates to the public, iwi, and conservation NGOs. Consider annual public hui, newsletters, or webinars presenting monitoring data, harvest outcomes, and ecological trends. This transparency can foster legitimacy and reduce potential conflict.

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### Broader Reflections

The proposal to designate the Fiordland wapiti herd as a Herd of Special Interest is not a routine policy decision — it represents a structural shift in how introduced game animals may be managed within some of Aotearoa New Zealand’s most sensitive and nationally treasured landscapes.

Fiordland is a cornerstone of our conservation identity: a National Park, part of Te Wāhipounamu World Heritage Area, and an ecosystem already under immense pressure from deer, pests, climate impacts, and historical disturbance. Any framework introduced here must therefore meet an extremely high bar of ecological precaution, Treaty integrity, and public accountability.

The Plan acknowledges these pressures but underestimates their significance. A HOSI designation in Fiordland cannot be treated simply as an evolutionary step in game management. It will set a **national precedent** — legally, ecologically, culturally, and socially. What is approved here will likely shape expectations for other HOSI proposals across New Zealand, including sika in the central North Island and future species. If the Fiordland framework is vague, permissive, or overly reliant on voluntary mechanisms, it risks creating a pathway where conservation values can be weakened piecemeal across multiple regions.

The Plan is promising in that it seeks to bridge the interests of hunters and conservationists, but its success will ultimately depend on whether ecological outcomes genuinely improve — in a measurable, independently verifiable way. Without clear ecological thresholds, robust co-governance with iwi, transparent funding, and strong accountability, this model risks becoming an administrative compromise rather than the high-performing management system it claims to be.

Fiordland demands a model that is not merely “workable,” but exemplary. This Plan must lead, not follow. It should articulate a standard that meets the expectations of Treaty partners, satisfies conservation science, and demonstrates that a HOSI designation is not a dilution of existing protections, but a genuine enhancement of them. Only then will New Zealanders — hunters, iwi, conservation groups, and the broader public — have confidence that this designation strengthens, rather than undermines, the long-term health and integrity of one of our greatest national landscapes.

## Conclusion

Given the ecological sensitivity of Fiordland and the unique precedent this decision will set for future Herds of Special Interest, I cannot support the Plan in its current form unless critical improvements are made.

The Wapiti HOSI can succeed — but only if it is held to the highest standard of scientific rigour, transparency, and Treaty partnership. The draft Plan is a strong foundation, yet it remains too broad, too discretionary, and too reliant on goodwill rather than enforceable commitments. A designation of this magnitude requires more than intentions; it requires **clear ecological targets, binding performance measures, demonstrable iwi leadership, robust enforcement capability, and transparent long-term funding.**

I strongly urge DOC and the Minister to strengthen the Plan in the following ways before any designation is approved:

- Embed **specific, measurable ecological thresholds** that must be met — not just monitored — to justify ongoing HOSI status.
- Establish a **formal co-governance structure with iwi**, not merely consultation or partnership rhetoric.
- Mandate **independent ecological auditing**, with results published transparently and annually.
- Require **detailed, long-term financial and enforcement planning**, so the Plan is deliverable rather than aspirational.
- Include strong **triggered management responses** if ecological indicators decline or fail to meet targets.

The public, iwi, conservation scientists, and hunters all deserve clarity about how success will be defined, measured, and enforced. A HOSI should elevate management standards — not soften them. If the Fiordland Wapiti HOSI is to serve as the national template, it must demonstrate unequivocally that game animal management can coexist with, and actively enhance, the protection of native ecosystems.

Therefore, I support the concept of a Fiordland Wapiti Herd of Special Interest **only if the revised Plan is strengthened to meet these high standards.** Anything less risks compromising the ecological integrity of Fiordland and setting a weakened precedent for all future HOSI designations.

Ngā mihi nui,



Natalie Hinke

s9(2)(a)

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s9(2)(a)

s9(2)(a)

## Emma Bennett

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**From:** Natalie Hinke s9(2)(a)  
**Sent:** Monday, 24 November 2025 8:45 pm  
**To:** wapitiHOSIHMP  
**Subject:** Submission on the Fiordland Wapiti Herd of Special Interest Draft Management Plan  
**Attachments:** 2025-11-24\_Hinke\_Submission on the Draft Plan for Wapiti.pdf

**Categories:** Green category

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**Tēnā koutou,**

Please find attached my formal submission on the **Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan**.

In summary, I support the concept of a Fiordland Wapiti HOSI **only if the final management plan is significantly strengthened** to ensure it meets the very high ecological, cultural, and governance standards appropriate for Fiordland National Park and Te Wāhipounamu World Heritage Area.

My submission outlines several key concerns and recommendations, including the need for:

- **Clear, measurable ecological thresholds** that must be met to justify ongoing HOSI status.
- **Formalised co-governance with iwi**, ensuring Treaty responsibilities are embedded in every stage of management.
- **Independent ecological auditing and transparent annual reporting**, so that progress can be verified and trusted.
- **Robust enforcement capability and resourcing**, rather than relying on voluntary compliance.
- **A detailed long-term financial plan**, demonstrating that monitoring, enforcement, and management actions can be sustainably delivered.

Given that this decision will set a **national precedent** for future Herds of Special Interest, it is essential that the Fiordland model is exemplary — not merely adequate. The Plan must elevate conservation outcomes and strengthen ecological protection, not dilute existing safeguards.

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

Ngā mihi nui,

Natalie Hinke

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s9(2)(a)

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# Alex Hockley

Submission Details

## Eirwen Harris Mitchell

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**From:** Alex Hockley s9(2)(a)  
**Sent:** Monday, 8 December 2025 12:42 am  
**To:** wapitiHOSIHMP; SikaHerdOfSpecialInterest@doc.govt.nz  
**Subject:** Submission on the Draft Wapoti Herd of Special Interest (HOSI) Management Plan

**Categories:** Green category

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Alex Hockley, s9(2)(a).

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

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

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

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

Ngā mihi nui,  
Alex Hockley

# Ted Howard

Submission Details

## Eirwen Harris Mitchell

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**From:** s9(2)(a)  
**Sent:** Monday, 8 December 2025 6:00 pm  
**To:** wapitiHOSIHMP  
**Subject:** Submission on Wapiti HOSI MP

**Categories:** Green category

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Firstly, I am not opposed to maintaining herds of interest everywhere on the DoC estate, but to me the primary purpose of National Parks needs to be the preservation of NZ native biodiversity, and the only purpose for hunting in National Parks is to reduce introduced pests to the lowest level possible. I have been a hunter most of my life.

Outside of national parks, maintaining herds of interest in areas designated for recreation, is a perfectly reasonable thing to do, but I just can't see it being compatible with maintaining NZs unique ecosystems within our national parks, those systems do get profoundly changed by introduced life forms, particularly ungulates.

To me, hunting in national parks needs to always be with the purpose of eradication of the thing being hunted (or as close to as is reasonably possible).

Ted

Ted Howard

Mobile Ph s9(2)(a)

Physical/Postal: s9(2)(a) NEW ZEALAND

Location: s9(2)(a)

# Stewart Hydes - NZDA Rakaia Branch

Submission Details

## Eirwen Harris Mitchell

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**From:** s9(2)(a)  
**Sent:** Monday, 8 December 2025 5:31 pm  
**To:** wapitiHOSIHMP  
**Subject:** Submission on Fiordland Wapiti and Sika Herds of Special Interest Draft Management Plans

**Categories:** Green category

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### Introduction

#### New Zealand Deerstalkers Association

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

#### NZDA's Rakaia Branch

NZDA's Rakaia Branch was established in 1959.

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

#### Our Submission

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

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

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

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

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

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

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

Our efforts are at No Cost to taxpayers and ratepayers.

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

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

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

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

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

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

We cannot help ourselves.

It is what we do.

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

On behalf of NZDA - Rakaia Branch.

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

Ph [REDACTED] s9(2)(a)

[REDACTED] s9(2)(a)