

Fiordland Wapiti Herd of Special Interest

Draft Herd Management Plan

Submission Attachments - submitter last name J - Sn

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Corina Jordan - Game Animal Council

Submission Details

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Cc: Kaylyn Pinney; DLVC_NEW ZEALAND GAME ANIMAL COUNCIL; Grant Dodson
Subject: Game Animal Council Submission on the Wapiti draft Herd Management Plan
Attachments: GAC Submission - Wapiti HMP_final.pdf; Requested changes table_Wapiti_final.pdf; Marked up version_draft Fiordland Wapiti HMP_final.docx

Categories: Green category

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Good afternoon,

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

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

Ngā mihi

Corina Jordan

Chief Executive Officer

[New Zealand Game Animal Council](#)

s9(2)(a)

<https://nzgameanimalcouncil.org.nz/>



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08 December 2025

Wapiti HOSI Draft HMP Submissions

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

Executive summary

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

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

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

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

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

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

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

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

1 The Game Animal Council

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

2 Overarching position

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

3 The relationship between the HMP and the GAC

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

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

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

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

11. The purpose of the GAC Act is, amongst other things, to empower the GAC to fulfil its functions, and to manage HOSI (s3).
12. The GAC has broad functions relating to the hunting sector generally, and the management of HOSI specifically. The GAC's functions in relation to HOSI are (s7(i)):
- a. To undertake management functions compatible with the management of public conservation land,
 - b. To exercise powers for effective herd management.
13. The Minister may delegate any of the powers listed in s 18, except s 18(1)(e), to the GAC (s20).² The Minister's powers in relation to game animals and HOSI include (s18):
- a. regulating hunting by various means, and
 - b. authorising operations for managing and controlling the size of the population of game animals .
14. The powers in s 18 may only be delegated to GAC if the Minister is satisfied that management by the Council of the herd to which the delegation relates is consistent with the overriding considerations, and *will improve the management of the herd* (s20(6)(b)).³
15. A HOSI may be designated if the animals are of special interest to hunters, and the designation will produce expected benefits through *managing the animals for hunting purposes* (16(3)(e)).
16. While the Minister must have regard to the purposes of the WAC Act when designating a HOSI,⁴ wild animal control plans and statements of general policy under that Act do not prevail over the GAC Act.⁵ Furthermore, s 19 does not require that a Herd Management Plan be consistent with or adopt the provisions of the WAC Act.
17. The GAC Act does not contemplate the eradication of game animals in a HOSI. Rather, the Act requires the sustainable management of the herd. While the Minister is required

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

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

⁴ s 16(1)(b)(i).

⁵ WAC Act, s 5A(1).

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

4 The HMP must be consistent with its governing legislation

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

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

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

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

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

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

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

4.2 Effective herd management achieves hunting and conservation goals

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

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

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

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

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

28. Changes required for consistency with the GAC Act:

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

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

5 The importance of overriding considerations

30. The draft HMP states:

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

31. The Minister may delegate functions related to HOSI to the GAC, if the Minister is satisfied that management by the GAC is consistent with overriding considerations (s20(6)(b)(ii) GAC Act). The HMP binds the GAC, so the Minister must be satisfied that the HMP is consistent with the overriding considerations, before delegating functions to the GAC.

32. There is no explanation or analysis on how the HMP meets the consistency test. This presents a risk to the adoption and implementation of the HMP, as its legitimacy could be challenged. It also presents a risk to the Minister exercising his power to delegate HOSI functions to the GAC.
33. The lack of detailed analysis of overriding considerations is especially pertinent to the Fiordland wapiti case because the HOSI area falls within a National Park. National Park legislation and policy emphasises the preservation of the ‘natural state’ and the extermination of introduced species⁸. These directives present a challenge to the designation of deer as a valued species and subsequent sustainable herd management. We are concerned that the unsubstantiated statement of consistency in the draft HMP will jeopardise the legitimacy of the HMP under the GAC Act and overriding considerations.
34. We reiterate our request that the analysis that underpins the statement of consistency is made available to the GAC, and the Fiordland Wapiti Foundation.

35. Changes required:

- a. A full Overriding Considerations Policy Analysis should be made available at the same time as the HMP to provide necessary legal grounding and transparency.

6 Next steps

36. Our submission points above detail our primary concerns with the draft HMP, and should be read in tandem with the critical changes in Appendix A and as tracked in Appendix B. These required changes are the bare minimum to ensure the HMP does not constrain the functions of the GAC to an unworkable management framework.
37. Our preference would be for the GAC to have the delegated authority to develop a HMP for the Wapiti HOSI. We have developed a framework that would result in a values-based HMP that gives effect to adaptive, good game animal management principles and that appropriately considers the overriding considerations, as well as providing a framework for engaging with tangata whenua and the reflection of their values and aspirations.

⁸ National Parks Act 1980, National Parks General Policy 2005, Fiordland National Park Management Plan 2007.

38. Unfortunately, due to time and engagement constraints, we were unable to develop an alternative HMP within the submission period. However, we would like to note that a values-based HMP template and adaptive management plan for the Wapiti Hosi was provided to DOC prior to the draft HMP being released for consultation.

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

6.1 The chain of logic

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

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

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

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

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

43. Game animal management for hunting purposes is the systematic application of ecological, biological, and socio-economic principles to regulate and sustain

populations of legally designated game species in a manner that supports hunting and is consistent with conservation goals.

44. It involves monitoring population dynamics, setting harvest targets, implementing habitat management, and manipulating demographic structure to ensure that hunting activities are both sustainable and aligned with conservation objectives. Demographic structure relates to animal density or abundance, herd structure in relation to habitat use, and browse impacts across variable landscape composition, e.g., forest structures, alpine areas, etc.
45. Effective game animal management considers hunter access, species distribution, and behavioural ecology to meet hunting demand while supporting long-term population management.
46. Implementing effective herd management is a long-term undertaking that will be delivered over time rather than at a single point in time. Some objectives may be achieved in quickly, e.g., hunter perception of regulatory change, while others, e.g., vegetation response, will likely take much longer. The plan needs to recognise that longer-term objectives for things that change slowly, like vegetation condition, do, in fact, change slowly and should therefore temper expectations for a rapid response. Natural, social, and economic environments are also not static, and management must respond to changes in these environments to maintain the direction set by objectives over time.

6.3 Adaptive management in practice

47. The draft HMP states it embodies 'adaptive management', but it reads as a reactive control plan. It is not strategic and is vulnerable to external changes (climate, natural hazard, political, legislative). There are currently no trigger points or adaptive pathways in the draft HMP, and it does not follow adaptive management principles.
48. The draft HMP inappropriately embeds precise, operational metrics into the statutory five-year document. This restricts the ability to make swift, science-based adjustments in the Annual Operational Plan (AOP).
49. Fixing targets such as sex ratios (Strategy 1.2c) prevents those managing the herd from lowering or raising the ratio in response to ecological data (e.g., a disease event or a

sudden change in browse pressure), thereby undermining the stated goal of adaptive management.

- 50. True adaptive management requires planning for contingencies. The draft HMP is currently silent on what happens if a strategy fails. The mandated review period is five years, which is too slow to address rapid ecological changes or political/funding shocks.
- 51. We recommend the HMP takes a long-term approach with thresholds that trigger different management pathways. These management pathways will be linked to an objective, but the way to achieve the objective will be flexible depending on monitoring data.
- 52. We propose a specific structure for how strategies are drafted to ensure the strategies embody true adaptive management.
- 53. A strategy cannot simply be a description of an activity. Each strategy within the HMP must contain four mandatory components to function within an adaptive feedback loop.
- 54. Our recommended structure is based on expert feedback from the game animal and adaptive planning sectors, and includes:
 - Action: The specific management intervention or activity to be undertaken.
 - Measure: The data or metric required to validate the effectiveness of the action.
 - Reporting: The frequency and format in which the measure is reported to a relevant party (e.g., governance, iwi, stakeholders).
 - Response: A pre-defined trigger or threshold that dictates what happens if the measure deviates from the related objective.
- 55. We present an example below to demonstrate how our proposed structure would work in practice:

Value	Hunting values
--------------	----------------

Objective	Provide for high-quality hunting experiences through management of the Fiordland Wapiti herd.	
Strategy	Healthy animals to hunt	
	Action	Selectively harvest and control wapiti to shift herd demographics to increase the prevalence of healthy hinds and high quality stags.
	Measure	Use herd health indicator (HHI) monitoring to identify trends in wapiti population demographics.
	Report	HHI trends are reported on annually and considered in the next operational planning cycle.
	Respond	Adjust selective harvest and control measures to work towards achieving the objective.

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

6.4 The relationship between the HMP and the Adaptive Management Plan

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

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

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

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

Value	Adaptive, sustainable herd management	
Objective	Apply an adaptive management framework based on monitoring and research to implement this plan.	
Strategy	Develop and maintain an Adaptive Management Plan for the Wapiti HOSI.	
	Action	The development of a technical AMP detailing monitoring sites, specific biometric methodologies, and data analysis protocols.
	Measure	Expert assessment (using recent research, monitoring data and hunter reporting, etc.) of triggered pathways to determine whether thresholds and signals are appropriately set.
	Report	Report on whether the adaptive management plan is contributing to achieving the objectives.
	Respond	Amend adaptive management plan based on the results from reporting and engagement with governance, iwi and stakeholders.

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

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

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

Value	Objective	Applications	Trigger points	Pathways
Hunting values	Provide for high-quality hunting experiences through management of the Fiordland Wapiti herd.	HHI monitoring is undertaken annually.	Mean body condition scores below [a pre-determined number].	Population management intervention
			Decreasing mean jaw length and reproductive status	Population management intervention
		Opportunities for enhancing hunter experiences are explored collaboratively with hunters.	Identification of opportunities for enhancing hunter experiences	Design and implementation of new opportunities.

7 Summary of changes required and conclusion

64. Our critical required changes are:

Category	Changes required
Effective herd management	Amend the HMP so that it is consistent with effective herd management as set out in the GACA rather than being a Control Plan.
	Draft future HMP using the values based template prepared by GAC, and ensure they align with the Principles of Quality Game Animal Management, set out in Error! Reference source not found..

	Amend the HMP to explicitly provide for the ‘sustainable management for hunting purposes while ensuring conservation values continue to be protected’ (GAC Act language).
	Remove all animal control language from the HMP. Substitute all instances of ‘control target’ with ‘population management target’ or ‘sustainable harvest target’ to align the Plan with the HOSI's primary purpose.
Overriding considerations	A full Overriding Considerations Policy Analysis should be made available at the same time as the HMP to provide necessary legal grounding and transparency.

65. These changes are in addition to the detailed changes listed in Appendix A.

7.1 Conclusion

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

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

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

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

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

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Corina Jordan', with a stylized, cursive script.

Corina Jordan

Chief Executive Officer

New Zealand Game Animal Council

Appendix A Detailed changes required

Appendix B Marked up draft HMP

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

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

HMP section	Key issues	Solution sought	Example drafting
Foreword			
Foreword	<p>The purpose of the plan is not to recognise the unique values of the <i>area</i> but to recognise the unique values of the <i>wapiti herd</i>. This purpose statement reflects a conservation plan, which frames hunters as a tool for deer population control.</p> <p>The reference to conserving the HOSI area in its natural state is problematic because it is a point of contention whether game animals have a place within that natural state.</p>	Amend the purpose statement to accurately reflect the purpose of the HMP under the GAC Act.	<p>The Plan seeks to recognise The Plan seeks to recognise the outstanding values of Fiordland National Park, the World Heritage Area status of Te Wāhipounamu – South West New Zealand, and the unique place Fiordland wapiti have come to have within the Park; the Fiordland Wapiti herd as a Herd of Special Interest reflecting its special values. The population of wapiti present the only wild hunting opportunity for wapiti-like deer in the Southern Hemisphere. Their value lies in their historic lineage, unique biology, economic and tourism value and the contribution they make to community wellbeing.</p> <p><u>The Plan seeks to recognise the outstanding values of Fiordland National Park, the World Heritage Area status of Te Wāhipounamu – South West New Zealand, and the unique place Fiordland wapiti have come to have within the Park; the Fiordland Wapiti herd as a Herd of Special Interest reflecting its special values. The population of wapiti present the only wild hunting opportunity for wapiti-like deer in the Southern Hemisphere. Their value lies in their historic lineage, unique biology, economic and tourism value and the contribution they make to community wellbeing.</u></p> <p>In doing so, the Plan attempts to balance the critically important task of will sustainably manage conserving New Zealand’s most precious wild spaces in their natural state with the day-to-day realities of conservation and wild animal management; the herd and their habitat. Through this management, the recreational hunting experience will be enhanced, alongside public use and enjoyment and ecological benefits within the HOSI area.</p> <p><u>will sustainably manage conserving New Zealand’s most precious wild spaces in their natural state with the day-to-day realities of conservation and wild animal management; the herd and their habitat. Through this management, the recreational hunting experience will be enhanced, alongside public use and enjoyment and ecological benefits within the HOSI area.</u></p>

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

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

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

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

HMP section	Key issues	Solution sought	Example drafting
Objectives			
Section 3, Objective 1	<p>We oppose the wording of this objective.</p> <p>Draft Objective 1 links wapiti management to the maintenance of natural biodiversity. Biodiversity is affected by multiple factors in addition to wapiti, for example disease, climate and weeds. It is not appropriate to seek overall ecosystem management as a result of management of one part of that ecosystem. The requirement to ‘prevent the loss of indigenous species from their current range’ is too onerous and sets an unattainable goal for the HMP given that deer do not affect all indigenous species and species loss is not purely the result of wapiti browse.</p>	<p>The management of the wapiti herd should be linked only to its impacts and set realistic ecological outcomes for matters affected by wapiti and their management, not overall ecosystem management.</p>	<p>Fiordland wapiti are managed in a manner that allows for the maintenance of natural biodiversity by restoring ecological processes and communities of browsed indigenous flora and preventing the loss of indigenous species from their current range.</p> <p><u>Maintain or enhance the current condition of vegetation adversely affected by wapiti browse through management of the wapiti herd.</u></p>
Section 3, Objective 2	<p>We oppose the wording of this objective.</p> <p>The draft objective does not reference sustainable management and the structure of the objective weakens its directive. A key goal is to improve the quality <i>and</i> quantity of wapiti hunting opportunities and the objective should reflect that.</p>	<p>Amend the objective to be more directive and clearly link to the management of the herd.</p>	<p>The Fiordland wapiti hunting experience is enhanced, and the Fiordland wapiti herd produces high-quality bulls for balloted hunters to take annually during the bugle.</p> <p><u>Manage the herd to sustainably produce high-quality bulls for hunters to take during the bugle and enhance recreational hunting opportunities and experiences.</u></p>

HMP section	Key issues	Solution sought	Example drafting
Section 3, Objective 3	<p>We support this objective with amendments.</p> <p>The draft objective uses passive language, which obscures accountability and weakens the call to action.</p>	Amend the objective to focus on the continuous, sustainable funding necessary to deliver the HMP. Ensure that one-off funds are included.	<p>Generate sufficient revenue through partnerships and sponsorships, seek to recover costs from the hunting community, and in-kind support is increased to ensure the delivery of this Plan is wholly or largely self-funded.</p> <p><u>Build or maintain sources of income, partnerships, and in-kind support that support and advance the other objectives of this HMP.</u></p>
Section 3, Objective 4	<p>We support the intent of this objective, but seek changes to the wording.</p> <p>The draft objective doesn't emphasise the right outcome. The purpose of building hunter and community involvement in herd management is to enhance the experience within the Wapiti HOSI area and to achieve ecological outcomes.</p>	Delete Objective 4 and replace with an objective that ensures hunter-led engagement in both conservation (e.g., trapping) and social (e.g., access/ community support) projects. The new objective should integrate wording from key conservation legislation and policy to ensure the HMP progresses in line with the overriding considerations.	<p>Engage the hunting community in the management of Fiordland wapiti and the Wapiti Area so the community provides support for local conservation and social initiatives.</p> <p><u>Build or maintain hunter and community involvement in:</u></p> <p>a) <u>Initiatives that enhance the recreation, use and enjoyment of the public in the Wapiti Area.</u></p> <p>b) <u>Conservation initiatives that promote the health and wellbeing of indigenous plants and animals.</u></p>
Section 3, Objective 5	Draft Objective 5 seeks that 'opportunities for tangata whenua to be involved and participate... are increased'. The terms 'participation' and 'involvement' do not fully capture the statutory and	Language in this objective should reflect the aspirations of iwi and hapū. Where those aspirations are unknown, active	The Treaty partner relationship with Papatipu Rūnanga and Te Rūnanga o Ngāi Tahu is strengthened, and opportunities for Papatipu

HMP section	Key issues	Solution sought	Example drafting
	<p>customary rights of iwi or the GAC’s aspirations as partners under Te Tiriti.</p> <p>DOC has not facilitated meaningful engagement between the GAC, FWF and iwi and hapū, so our recommended objective is not based on HMP-specific advice from tangata whenua.</p> <p>The GAC place high priority on building meaningful relationships with tangata whenua that are based on mutual respect. The draft objective does not reflect this commitment – using passive language when referring to relationships with tangata whenua.</p>	<p>and empowering language should be used to ensure herd managers are held to account as partners under Te Tiriti.</p> <p>The GAC are committed to being good Treaty partners and authentically engaging with tangata whenua on herd management is a priority for us.</p>	<p>Rūnanga to be involved and participate in the management of Fiordland wapiti are increased.</p> <p><u>Strengthen the Treaty partner relationship with Papatipu Rūnanga and Te Rūnanga o Ngāi Tahu through regular engagement to identify shared aspirations and opportunities for involvement.</u></p>
Section 3, Objective 6	<p>Improving knowledge is a tool used to achieve an objective. It does not constitute an objective itself.</p> <p>In a management context, research is valuable if it feeds into the adaptive management loop. The objective should be to reduce uncertainty to allow for better decisions, not just to improve understanding.</p>	<p>Remove Objective 6 and merge the research component with the monitoring and adaptive management objectives.</p>	<p>Knowledge and understanding of the dynamics between Fiordland wapiti and indigenous species and ecosystems are improved.</p>
Section 3, Objective 7	<p>Draft Objective 7 is procedural, not outcome focussed. It states what monitoring will do but does not tie that to a measurable outcome. There is a lack of accountability, and the use of passive language weakens the link between monitoring data and adaptive management actions.</p>	<p>Remove Objective 7 and merge the adaptive management component with the research objectives.</p>	<p>Monitoring enables adaptive management and demonstrates whether the management of Fiordland wapiti is achieving the objectives and strategies of this Plan.</p>

HMP section	Key issues	Solution sought	Example drafting
Section 3, Objective 8	Draft Objective 8 describes a relationship not an outcome. It is not measurable and does not tie research to the adaptive management framework. Passive language obscures accountability and the call to action.	Remove Objective 8 and merge the research component with the monitoring and adaptive management objectives.	Research supports and enhances management of Fiordland wapiti and the Wapiti Area.
Section 3, Objective 9	This is a very administrative and circular objective. It does not contain a strategic element and is not outcome focused.	Remove Objective 9.	Public reporting provides information on whether the Plan is achieving the Objectives.
Section 3, new objective	Draft Objectives 6 – 8 are procedural, not strategic. They isolate monitoring, research and reporting, which are fundamental components of an adaptive management system. This has the potential to weaken adaptive management in the HOSI, which requires a holistic approach.	Insert a new objective that embeds adaptive management principles for all HMP objectives governing the entire HMP cycle.	<u>Apply an adaptive management framework based on monitoring and research to implement this plan.</u>
Section 3	The current ordering of the objectives dilutes the importance of hunting values and upholds conservation values as the most important.	Re-order the objectives to effectively balance values in the context of the HMP.	<ol style="list-style-type: none"> 1. Manage the herd to sustainably produce high-quality bulls for hunters to take during the bugle and enhance recreational hunting opportunities and experiences. 2. Maintain or enhance the current condition of vegetation adversely affected by wapiti browse through management of the wapiti herd. 3. Strengthen the Treaty partner relationship with Papatipu Rūnanga and Te Rūnanga o Ngāi Tahu through regular engagement to

HMP section	Key issues	Solution sought	Example drafting
			<p>identify shared aspirations and opportunities for involvement.</p> <ol style="list-style-type: none"> 4. Build or maintain hunter and community involvement in: <ol style="list-style-type: none"> a. initiatives that enhance the benefit, use and enjoyment of the public in the Wapiti area. b. conservation initiatives that promote the health and wellbeing of indigenous plants and animals. 5. Build or maintain sources of income, partnerships, and in-kind support that support and advance the other objectives of this HMP. 6. Apply an adaptive management framework based on monitoring and research to implement this plan.
Strategies			
Section 3, Strategy 1.1	<p>We oppose this strategy.</p> <p>Draft Strategy 1.1 enforces a short-term pest control model (body counts) rather than a long-term game management model. This conflicts with the herd being a valued resource in need of sustainable management.</p>	<p>Remove Strategy 1.1</p> <p>The strategies should be focused on the health of the herd and their habitat through sustainable management.</p>	<p>Set and review annual wapiti management targets to manage populations in a way that aligns with the objectives and strategies of this Plan.</p>

HMP section	Key issues	Solution sought	Example drafting
Section 3, Strategy 1.2	Protecting and enhancing the hunting experience under this HMP should not be limited to the Wapiti bugle. This HMP manages the herd to enhance the hunting experience for all recreational hunters – not just those hunting during the bugle.	We support this strategy with amendments to remove the time constraint and to refer to ‘herd management’ instead of ‘control’.	Coordinate and manage recreational hunting, herd management hunts, and professional control operations <u>herd management activities and harvest activity</u> to selectively remove Fiordland wapiti in a way that: <ul style="list-style-type: none"> a) protects and enhances the hunting experience during the annual bugle; b) optimises genetic selection and minimises hybridisation; c) maintains a male-biased population, <u>with a higher proportion of older males. sex ratio of 1.1 bulls per cow</u>; and d) achieves a proportional increase in older bulls in the herd.
Section 3, Strategy 1.7	We support this strategy with amendments. Passive language obscures accountability and weakens the mandate to implement the strategy for its intended outcome.	Amend the strategy to use active language.	Seek to c Charge fees to hunt Fiordland wapiti to cover costs associated with managing the Fiordland Wapiti Herd of Special Interest, such as advertising, hunter education and management, and animal management and control activities undertaken throughout the year.
Section 3, new strategy	There is a gap where the hunting community should be consulted when developing authorisation, education and promotional materials to make sure	Add a strategy to ensure hunter values are reflected in educational and promotional material.	<u>Work with the hunting community when developing hunter authorisation, education and promotional materials to ensure that these</u>

HMP section	Key issues	Solution sought	Example drafting
	their values and interests are reflected and that all material is fit for purpose.		<u>appropriately recognise and provide for their values and interests.</u>
Section 3, Strategy 1.8	<p>We support this strategy with amendments.</p> <p>The HOSI mechanism changes the status of deer from ‘pests’ to valued game animals. The use of control-centred language reflects the status under the WAC Act, not the sustainable herd management language of the GAC Act.</p> <p>Passive language obscures accountability and weakens the mandate to implement the strategy for its intended outcome.</p>	<p>Amend strategy to refer to ‘herd management’ instead of ‘control’.</p> <p>Amend the strategy to use active language.</p>	<p>Commercial recovery and professional control <u>herd management</u> operations</p> <p>Use authorised commercial recovery and professional control <u>herd management</u> operations as part of Fiordland wapiti management, applying the following criteria:</p> <ol style="list-style-type: none"> a) Seek to Incentivise commercial recovery contributions to control <u>herd management</u> targets where necessary through subsidies funded by fees, sponsorship and other commercial partnerships associated with the Fiordland Wapiti Herd of Special Interest. b) Focus professional control <u>herd management</u> operations on difficult-to-access areas where recreational hunting and commercial recovery operations cannot meet control <u>herd management</u> targets, or doing so is not commercially viable. c) Seek to Meet professional control <u>herd management</u> operation costs through fees, sponsorship and other commercial partnerships associated with the Fiordland Wapiti Herd of Special Interest.

HMP section	Key issues	Solution sought	Example drafting
			d) Focus commercial recovery and professional control <u>herd management</u> operations on deer with the least wapiti-like characteristics.
Section 3, Strategy 2.1	<p>Support with amendments.</p> <ul style="list-style-type: none"> There is no stated purpose for the monitoring programme. The monitoring programme needs to be closely linked to the purpose of the HMP, its objectives and relate to the effectiveness of its strategies. A monitoring programme that is too broad, or not strongly linked to management strategies will not yield helpful information. The monitoring programme needs to be at an appropriate geographic scale, that will meaningfully relate to the impacts of deer and how they move in the landscape. Too broad a scale will not yield valuable information, and too fine a scale will waste effort. Faecal pellet counts are a poor metric for sustainable herd management because they fail to measure the interaction between deer and their habitat. Management should be precise, responsive and focused on ecological outcomes. Faecal pellet counts measure where deer have been not the impact they are having and are not the best tool to measure trends in herd activity. 	<p>Amend strategy to remove:</p> <ul style="list-style-type: none"> Faecal pellet counts as an ecological monitoring tool. Reference to the Conservation Boards. The requirement to monitor hunter contribution to control targets. The requirement to monitor hunter satisfaction with the HOSI management. <p>Amend strategy to <u>add</u>:</p> <ul style="list-style-type: none"> A purpose for the monitoring programme that reflects the impact of deer and the benefits of herd management activities, not generic ecosystem health measurements. A reference to appropriate geo-temporal scale 	<p>Develop and implement a monitoring programme that, <u>at appropriate geo-temporal scales, measures wapiti impacts, herd health and quality, and the benefits achieved through other management activities.</u> This should include the following:</p> <p>a) Ecological monitoring that covers both alpine areas (above the bushline) and forested areas (below the bushline), which may include, but is not limited to, the following methods and tools:</p> <ol style="list-style-type: none"> Seedling ratio index Permanent 20 x 20 metre plots Alpine deer browse Faecal pellet counts <p>b) Exploring the use of new monitoring methods, tools and technologies, and seeking the views of Papatipu Rūnanga, the Southland Conservation Board <u>Game Animal Council</u> and the Department prior to their use in the Wapiti Area.</p>

HMP section	Key issues	Solution sought	Example drafting
	<ul style="list-style-type: none"> The monitoring of hunter harvest should include metrics of the quality of the harvest, as well as the age and size, as this is a key measure of hunter benefit and the effectiveness of herd management. Conservation Boards do not have a role in sustainable game animal management, and involvement in sustainable game animal management is outside their statutory functions. DOC will provide sufficient representation of conservation values when discussing new monitoring methods, tools and technologies. New monitoring methods must be assessed for comparability with previous monitoring methods. If they are not the ability to understand long term changes are lost when monitoring methods change. The GAC is the expert body on sustainable game animal management and should be included in any discussion on new monitoring methods, tools and technologies. Referring to the ‘hunter contribution to control targets’ reduces recreational hunters to a pest control tool. This is inappropriate when directing monitoring for a valued game species. Hunter satisfaction monitoring should be based on the outcomes of sustainable herd management. It is not necessary to monitor 	<ul style="list-style-type: none"> Monitoring of the size and condition of wapiti and the size and quality of their antlers Ensuring that any new monitoring methods allow data to be compared and analysed between different methods so long term trends can be assessed. Reference to the GAC in strategy 2.1(b) 	<p>x) <u>Changes to monitoring methods, if made, must consider integration or comparability with previous monitoring tools to enable long-term trend analysis and reporting.</u></p> <p>c) <u>Monitoring herd health including the size and condition of animals, growth rates, antler quality, genetic integrity and herd structure the hunter harvest, which may include, but is not limited to, monitoring the hunter contribution to control targets and the age and length of jaws to determine herd age structure; genetic integrity and growth rates.</u></p> <p>d) Monitoring voluntary and partnership contributions to the key management objectives.</p> <p>e) Monitoring hunter <u>harvest and satisfaction with the management of Fiordland wapiti</u>, including, but not limited to, the:</p> <ol style="list-style-type: none"> i. quality of Fiordland wapiti available; and ii. ballot and authorisation process, including the information available to hunters prior to and after their hunting trips.

HMP section	Key issues	Solution sought	Example drafting
	<p>hunter satisfaction with the mechanics of herd management.</p> <p>Monitoring should directly relate to the values and objectives within the HMP.</p>		
Section 3, Strategy 2.2	<p>Support with amendments.</p> <p>Ecological monitoring methods should follow best practice within the sustainable herd management context. There is a risk that standards set by DOC may reflect a pest-control philosophy as that is the Department's mandate. Best practice methods and standards may be available that are more relevant to sustainable herd management, that are not adopted by DOC, and these should be available to implement the HMP.</p>	Amend strategy to reference best practice methods and standards, rather than just standards set by DOC.	Undertake ecological monitoring <u>using best practice methods and standards</u> , in accordance with relevant standards used or set by the Department.
Section 3, Strategy 2.4	<p>We support this strategy with amendments.</p> <p>Passive language obscures accountability and weakens the mandate to implement the strategy for its intended outcome.</p> <p>This research strategy is too general and doesn't direct research on long-term resilience factors.</p>	Amend the strategy to use active language and incorporate research on the resilience of the herd.	Seek opportunities to u Undertake or support research relevant to the management of Fiordland wapiti and/or their effects within the Wapiti Area, <u>including research on the resilience of the herd and the impact of herd management mechanisms.</u>

HMP section	Key issues	Solution sought	Example drafting
Section 3, Strategy 2.6	<p>We support this strategy with amendments.</p> <p>One of the main purposes of the HMP is to manage the herd for its hunting value. Therefore, research to better understand the management of the HOSI should also investigate the hunter experience.</p>	<p>Amend strategy to include research on the hunter experience within the HOSI area.</p> <p>Remove ‘spread and behaviours’ in (a) because these will be covered by ‘effects’ of wapiti on their ecosystem.</p> <p>Add research on hunter harvest and satisfaction.</p>	<p>Undertake relevant research, including research related which may related to, but is not limited to, the:</p> <ul style="list-style-type: none"> a) changes in herd health and genetic composition of the Fiordland wapiti herd; b) spread, behaviours and effects of Fiordland wapiti on indigenous flora, and how this compares with that of other deer species; c) movement patterns and habitat utilisation of Fiordland wapiti within the Wapiti Area; and d) potential impacts of aerial hunting on the movements and habitat utilisation of Fiordland wapiti. e) <u>hunter harvest and satisfaction.</u>
Section 3, Strategy 3.1	<p>We support this strategy with amendments.</p> <p>Partnerships to meet the costs of implementing the HMP should not be limited to opportunities associated with wapiti, as this could unnecessarily limit opportunities.</p> <p>Passive language obscures accountability and weakens the mandate to implement the strategy for its intended outcome.</p>	<p>Delete reference to ‘associated with Fiordland wapiti’ in relation to commercial opportunities.</p> <p>Amend the strategy to use active language.</p>	<p>Seek to Develop partnerships and commercial opportunities associated with Fiordland wapiti to help meet the costs of implementing this Plan.</p>

HMP section	Key issues	Solution sought	Example drafting
Section 3, new strategy	<p>The HMP needs to better acknowledge the importance of engaging with land managers in the broader National Park. Wapiti and other deer will move between the Wapiti area and wider park. Working with neighbouring land managers will assist in managing the herd and address any cross boundary issues.</p> <p>The current strategies do not appropriately recognise the need for collaboration.</p>	<p>Include a new strategy under the heading 'Partnerships' to appropriately recognise the need for collaborative relationships with neighbouring land managers.</p>	<p><u>Work with parties who are involved in the management of deer populations adjacent to the Wapiti Area to support effective herd management.</u></p>
Section 3, Strategy 3.5	<p>We support this strategy with amendments.</p> <p>This strategy makes an assumption about how iwi and hapū want to be involved in herd management. Passive language obscures accountability and weakens the mandate to implement the strategy for its intended outcome.</p>	<p>Amend the strategy to use active language and to give tangata whenua autonomy over how they are involved.</p>	<p>Seek opportunities to Work with Papatipu Rūnanga, <u>to the extent they would like</u>, when developing hunter authorisation, education and promotional materials to ensure that Ngāi Tahu values and cultural information are recognised and provided for.</p>
Section 3, Strategy 3.6	<p>We support this strategy with amendments.</p> <p>This strategy makes an assumption about how iwi and hapū want to be involved in herd management. Passive language obscures accountability and weakens the mandate to implement the strategy for its intended outcome.</p>	<p>Amend the strategy to use active language and to give tangata whenua autonomy over how they are involved.</p>	<p>Seek opportunities to Work with Papatipu Rūnanga, <u>to the extent they would like</u>, to ensure that management activities recognise and reflect Ngāi Tahu values.</p>
Section 3, Strategy 3.7	<p>We support this strategy with amendments.</p>	<p>Amend strategy to remove reference to 'control' activities.</p>	<p>Provide a range of opportunities for the hunting community and other interested parties to</p>

HMP section	Key issues	Solution sought	Example drafting
	The HOSI mechanism changes the status of deer from 'pests' to valued game animals. The use of control-centred language reflects the pest status under the WAC Act, not the sustainable herd management language of the GAC Act.		actively contribute to Fiordland wapiti <u>herd management and control</u> activities.
Section 3, Strategy 3.10	We support this strategy with amendments. Passive language obscures accountability and weakens the mandate to implement the strategy for its intended outcome.	Amend the strategy to use active language.	Seek to Provide a range of opportunities for the hunting community and other interested parties to contribute to wider conservation initiatives within the Wapiti Area, such as predator trapping and control programmes and the maintenance of historic huts and public recreation infrastructure.
Section 3, Strategy 4.1	We support this strategy with amendments. The HOSI mechanism changes the status of deer from 'pests' to valued game animals. The use of control-centred language and reduction 'targets' reflects the pest status under the WAC Act, not the sustainable herd management language of the GAC Act. Specific operation details should be determined during the Annual Operational Plan process, as they restrict the strategic and adaptive functions of the HMP.	Amendment strategy to: <ul style="list-style-type: none"> Refer to 'management' instead of 'control'. Clarify targets refer to management not control. Defer the setting of operational details to the Annual Operational Plan process.	Develop an annual operational plan for the activities planned for the coming year to help achieve the objectives. This operational plan should include, but is not limited to: <ol style="list-style-type: none"> setting <u>operational areas and annual population-herd management and control targets and focus areas, including desirable herd composition the sex ratio of Fiordland wapiti and specific locations within the Wapiti Area for control.</u> outlining <u>herd management activities methods to achieve annual herd management targets, such as recreational hunting, herd management hunts and professional control operations;</u>

HMP section	Key issues	Solution sought	Example drafting
			<ul style="list-style-type: none"> c) determining the annual ballot process (including ballot times and a breakdown of block dates); d) identifying any other planned work or initiatives; and e) identifying parties or entities responsible for management activities and related timeframes.
<p>Section 3, Strategy 4.2</p>	<p>We support this strategy with amendments.</p> <p>The HOSI mechanism changes the status of deer from ‘pests’ to valued game animals. The use of control-centred language reflects the pest status under the WAC Act, not the sustainable herd management language of the GAC Act.</p>	<p>Amend strategy to refer to ‘management’ instead of ‘control’.</p>	<p>Prepare and publish an annual report detailing the activities undertaken in the previous year, including, but not limited to:</p> <ul style="list-style-type: none"> a) overall herd management <u>activities</u>, including the number of Fiordland wapiti controlled <u>harvested</u>, the control <u>herd management</u> method(s) used, the areas where control <u>herd management</u> occurred and the control <u>herd management</u> effort; b) results and outcomes of monitoring activities, such as ecological monitoring and hunter participation and satisfaction evaluations; c) key metrics of the ballot process and related outcomes, such as the total numbers of ballot entrants, bugle participants and Fiordland wapiti taken during the ballot period, and the condition and quality of the animals;

HMP section	Key issues	Solution sought	Example drafting
			<ul style="list-style-type: none"> d) sponsorships and commercial partnerships; e) hunter training, education and community initiatives; f) wider conservation activities supported; and g) opportunities to improve <u>herd</u> management going forward.
Section 3, Strategy 4.3	<p>We oppose this strategy.</p> <p>The financial reporting required by the strategy is not appropriate in a statutory HMP document. Financial reporting will be undertaken as part of either the GAC's or DOC's annual reporting and audit requirements as statutory organisations.</p> <p>While the GAC supports transparency regarding the viability of the HOSI system, the HMP must not mandate the disclosure of detailed private expenditures or revenue streams of partner entities (such as the Wapiti Foundation or other NGOs).</p>	Delete financial reporting requirements.	<p>Include financial reporting in the annual report in relation to:</p> <ul style="list-style-type: none"> a) ballot processes and fees; b) Fiordland wapiti control and other conservation activities; c) overall expenditure on management of the Fiordland Wapiti Herd of Special Interest and contributions from the Department and/or central government; and d) monitoring.
Section 3, Strategy 4.4	<p>We oppose this strategy.</p> <p>Either the Game Animal Council or the Department of Conservation will be the statutory management entity for HOSI implementation, therefore the provision is unnecessary and creates undue bureaucracy.</p>	Remove Strategy 4.4.	<p>Work with the Department when preparing the annual report prior to its finalisation and public release.</p>

HMP section	Key issues	Solution sought	Example drafting
Section 3, Strategy 4.5	<p>We support Strategy 4.5 with an amendment.</p> <p>The Conservation Board operates under a different statutory mandate (Conservation Act 1987) that often conflicts with the objectives of the GAC Act 2013. Oversight of HOSI or the GAC is not within the functions of the Conservation Board.</p> <p>The Annual Report will be publicly available (Strategy 4.2) and accessible to the Conservation Board. Requiring the ‘presentation’ of the annual report to the Conservation Board implies it have a level of oversight over the HMP.</p>	Amend the strategy to remove reference to the Conservation Board.	Present the annual report to Papatipu Rūnanga and the Southland Conservation Board , if requested.
Compliance, review and enforcement			
Section 4, Plan compliance and review	The method of locking in a HMP for five years, then doing a whole of plan review does not align with adaptive management principles.	Add a paragraph that makes it clearer that where monitoring and reporting indicate changes to the HMP are required to support effective management of the herd before a 5 yearly review, that may be initiated.	<u>Where monitoring and reporting indicate that changes to this plan are required to support the effective adaptive management of the herd, a targeted review may be initiated earlier.</u>
Section 4, Plan compliance and review	Reviews of the HMP should only have to re-assess the HMP against the overriding considerations if there has been significant change either in the HMP or in the overriding considerations.	Clarify when a full assessment of the overriding considerations is required.	The review will consider annual reports, monitoring data and results, and relevant research as part of an assessment of whether the Plan’s objectives and strategies are delivering the benefits expected to be gained by managing

HMP section	Key issues	Solution sought	Example drafting
			<p>the Fiordland wapiti for hunting purposes. The review will also address the overriding considerations, <u>under the following circumstances:</u></p> <ul style="list-style-type: none"> • <u>if one or more of the overriding considerations has undergone significant reform since the last assessment, or</u> • <u>if major amendments are proposed to the HMP.</u> <p><u>Minor or administrative changes to the HMP will not require a full assessment against the overriding considerations.</u></p>
Glossary			
Authorisation	The definition of 'authorisation' does not reference that the power to issue authorisations may be delegated to the GAC under s20 of the GAC Act.	Amend the definition to include delegations.	Collective term for types of approvals (whether permits or otherwise) issued by the Minister for Hunting and Fishing under section 18 of the Game Animal Council Act 2013, <u>or issued by the Game Animal Council where this power is delegated to them by the Minister under section 20 of the Game Animal Council Act 2013.</u>

HMP section	Key issues	Solution sought	Example drafting
Community	The definition of community is limited to parties with an interest in conservation issue. This excludes those people who are interested in a recreational, commercial or social issue.	Expand the definition of community beyond conservation interests.	Any individual or group (whether statutory or non-statutory, formal or informal, commercial or non-commercial) with an interest in a particular conservation <u>conservation issue of relevance to the HOSI.</u>
Control target	The use of control-centred language reflects the pest status under the WAC Act, not the sustainable herd management language of the GAC Act. The different types of herd management can be captured in one term, which is defined. A definition is provided later in this submission.	Amend definition to refer to 'herd management activities'.	Control <u>Herd management target</u> A target number of deer to be removed from the Wapiti Area via <u>herd management activities</u> recreational hunting, commercial hunting and professional control operations on an annual basis, as set out in an annual operation plan.
Professional control operation	The use of control-centred language reflects the pest status under the WAC Act, not the sustainable herd management language of the GAC Act. This definition also refers to wapiti as 'wild animals' which is an incorrect classification. The HOSI mechanism changes the status of deer from 'wild animals' under the WAC Act to valued game animals.	Amend definition to refer to 'herd management' instead of 'control'. Remove reference to 'wild animals'.	Professional control <u>herd management</u> operation. Activities to search for and shoot wild game animals as a non-recreational and non-commercial activity specifically to help achieve control <u>herd management</u> targets. Professional control <u>herd management</u> operations generally do not may involve recovery of the animals or any parts of the animals. Professional control <u>herd management</u> operations may selectively target wapiti based on the sex and condition of individual animals.

HMP section	Key issues	Solution sought	Example drafting
Herd management activities	Providing an overarching phrase for all activities under this plan whose purpose is to assist in herd management is useful and will assist in the overall drafting of the plan.	Include definition of herd management activities.	<u>Herd management activities include any activity that manipulates the demographics of the herd including number and structure. It can include recreational hunting, commercial hunting, and professional herd management operations that are provided for in this plan.</u>

November 2025

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

Fiordland Wapiti Herd of Special Interest

Draft Herd Management Plan



Cover: Fiordland Wapiti Area. *Photo: Department of Conservation*

Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan

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

ISBN: Will be allocated upon approval of the Plan

Published by:

Department of Conservation Te Papa Atawhai

PB Box 10420, Wellington 6140

New Zealand



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Foreword

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

This is one of the first draft herd management plans prepared in accordance with the Game Animal Council Act 2013 to be publicly notified for submissions. It relates only to the management of Fiordland wapiti and the designation of a herd of special interest within the Wapiti Area in Fiordland National Park.

The Plan seeks to recognise the Fiordland Wapiti herd as a Herd of Special Interest reflecting its special values. The population of wapiti present the only wild hunting opportunity for wapiti-like deer in the Southern Hemisphere. Their value lies in their historic lineage, unique biology, economic and tourism value and the contribution they make to community wellbeing. the outstanding values of Fiordland National Park, the World Heritage Area status of Te Wāhipounamu—South West New Zealand, and the unique place Fiordland wapiti have come to have within the Park. In doing so, the Plan will sustainably manage attempts to balance the herd and their habitat. Through this management, the recreational hunting experience will be enhanced, alongside public use and enjoyment and ecological benefits within the HOSI area. critically important task of conserving New Zealand's most precious wild spaces in their natural state with the day-to-day realities of conservation and wild animal management.

The Plan also acknowledges the connection that Treaty partners and iwi Māori have to the area and seeks to recognise the significance of Fiordland National Park to all New Zealanders.

This Plan represents the culmination of years of effort in wapiti management by individuals and organisations, including the Fiordland Wapiti Foundation and the New Zealand Game Animal Council.

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

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

Similarly, I expect there to be a range of benefits for hunters, particularly the enhancement of an already high-quality and highly sought after hunting experience where hunters enjoy a unique wilderness experience.

It is my hope that there will also be a range of benefits for iwi, hapū and local communities. These include opportunities for Papatipu Rūnanga to be involved in Fiordland wapiti management activities and for the hunting community to be empowered and actively involved in the management of Fiordland wapiti. I anticipate that this will foster a sense of responsibility and stewardship among the hunting community and promote connections to the cultural and natural heritage of the Wapiti Area, with hunters increasingly contributing to a range of conservation efforts, such as chamois and deer control population management, environmental monitoring, maintenance of recreation facilities, and predator control initiatives.

I expect that managing Fiordland wapiti for hunting purposes will also lead to sustainable non-government funding for the management of the Wapiti Area and will have economic and social benefits for local communities. In this respect, I anticipate commercial benefits associated with hunter tourism, social benefits arising from the hunting community supporting local initiatives, and the retention of specialist expertise and capability in wild deer management, control, recovery and monitoring activities through ongoing management.

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

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



Hon James Meager
Minister for Hunting and Fishing

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10 November 2025

1 Introduction

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

The *Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan* (the Plan) has been prepared in accordance with section 19 of the Game Animal Council Act and only becomes effective if the herd of wapiti (*Cervus canadensis*) in Fiordland is designated as a herd of special interest under section 16 of that Act.

Purpose of this Plan

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

This Plan applies to all species of deer in genus *Cervus* that occur in the Wapiti Area in Fiordland National Park, as shown in Map 1, **Appendix 1**. These animals are collectively referred to as 'Fiordland wapiti'.

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

Application of the Plan and statutory context

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

Upon designation as a HOSI, the Fiordland Wapiti deer will no longer be classified as a wild animal under the WAC Act and will become a highly valued game species under the GAC Act.

The Fiordland Wapiti Herd of Special Interest designation and this Plan apply only to Fiordland wapiti and their management. They do not apply to the wider Fiordland National Park area or conservation management activities provided for by the National Parks Act 1980, Conservation Act 1987, Wild Animal Control Act 1977 or relevant statutory planning documents. Those Acts and planning documents continue to apply alongside this Plan. For example, they continue to regulate non-hunting-related concessions and authorisations and guide conservation and other animal management activities, such as predator control.

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

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

Overriding considerations

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

- welfare and management of public conservation land and resources generally;
- *General Policy for National Parks 2005*;²
- *Southland Murihiku Conservation Management Strategy 2016*;³
- *Fiordland National Park Management Plan 2007*;⁴ and
- pest management strategies and plans made under the Biosecurity Act 1993.

¹ Conservation Act 1987, section 4.

² New Zealand Conservation Authority. 2005. *General Policy for National Parks*. Wellington: Department of Conservation. doc.govt.nz/national-park-policy

³ Department of Conservation. 2016. *Southland Murihiku Conservation Management Strategy*. Wellington: Department of Conservation. doc.govt.nz/southlandcms

⁴ Department of Conservation. 2007. *Fiordland National Park Management Plan*. Invercargill: Department of Conservation. doc.govt.nz/fnnp-management-plan

Key parties and relationships relevant to this Plan

Minister for Hunting and Fishing

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

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

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

Ngāi Tahu

Ngāi Tahu are the tangata whenua with rangatiratanga or mana whenua (tribal authority) over the area covered by this Plan. Ngāi Tahu are the Crown's Treaty partner under the Treaty of Waitangi, and this Plan acknowledges the Crown's obligations to give effect to the principles of the Treaty as set out in section 4 of the Conservation Act, as well as its obligations under the Ngāi Tahu Deed of Settlement 1997, Ngāi Tahu (Pounamu Vesting) Act 1997 and Ngāi Tahu Claims Settlement Act 1998.

The relationship between Ngāi Tahu and the Minister of Conservation is the primary relationship with respect to the management of Fiordland National Park. This Plan is subject to the protocols required under section 282 of the Ngāi Tahu Claims Settlement Act.⁵

Lake Te Anau (Te Ana-au), which forms part of the eastern boundary of the Wapiti Area, is a Deed of Recognition site acknowledged by the Ngāi Tahu Claims Settlement Act.⁶ Many bird and plant species that are recognised as taonga (treasures) to Ngāi Tahu can be found within the Wapiti Area.⁷

The Wapiti Area is within the takiwā of the four Papatipu Rūnanga (Rūnaka) of Murihiku (Southland), which include:

- Ōraka-Aparima Rūnaka;
- Hokonui Rūnanga;
- Waihōpai Rūnaka; and
- Te Rūnaka o Awarua.

References to Papatipu Rūnanga in this Plan refer to these four rūnanga.

New Zealand Game Animal Council

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

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

The Minister for Hunting and Fishing may delegate powers to manage a herd of special interest to the Game Animal Council. These powers must be exercised for the effective management of the herd, consistent with the management of public conservation lands and resources generally, and in accordance with the Game Animal Council Act. Subject to the terms of any delegations, the Game Animal Council will work closely with the Fiordland Wapiti Foundation and the Department to implement this Plan.

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

⁵ As found on the Te Rūnanga o Ngāi Tahu website (ngaitahu.iwi.nz) and in Appendix 13 of the *Southland Murihiku Conservation Management Strategy 2016* (doc.govt.nz/southlandcms).

⁶ Deed of Settlement between Te Rūnanga o Ngāi Tahu and Her Majesty the Queen, 22 October 1998, Section 12: Mahinga Kai, Attachment 12.111. govt.nz/assets/Documents/OTS/Ngai-Tahu/Ngai-Tahu-Deed-of-Settlement-Section-12-Mahinga-kai-general-21-Nov-1997.pdf

⁷ Taonga species as per Schedules 97 and 98 of the Ngāi Tahu Claims Settlement Act 1998.

Fiordland Wapiti Foundation

The Fiordland Wapiti Foundation is an incorporated society that was established in 1993 and undertakes a range of management, community and conservation initiatives relating to wapiti in the Wapiti Area and wider Fiordland National Park.

Since 2005, the Fiordland Wapiti Foundation has undertaken an animal control programme in the Wapiti Area, working closely with the Department via a community agreement with the Director-General under section 53 of the Conservation Act. The Foundation's work has included managing the control and removal of around 900–1,100 deer from the Wapiti Area annually and managing recreational hunting in the Wapiti Area during key times, such as the bugle.

The Fiordland Wapiti Foundation also undertakes a range of predator trapping work, bird surveys, and facility maintenance and upkeep in the Wapiti Area as part of the community agreement.

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

Department of Conservation Te Papa Atawhai

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

On behalf of the Minister for Hunting and Fishing, the Department leads the statutory process to develop herd management plans and ensure that legislative requirements are met. The Department will support implementation of this Plan in accordance with delegations and directions of the Minister for Hunting and Fishing.

2 Values and key context

The value of the Wapiti Herd

The Fiordland wapiti herd is a New Zealand hunting icon that holds significant historic value to many New Zealanders. It represents the only wild hunting opportunity for wapiti-type deer in the Southern Hemisphere.

Hunters place a high value on wapiti deer because they produce the largest round-antler trophies of any deer species in New Zealand. The herd is of special interest to hunters as it offers a unique experience in a challenging, remote environment that acts as a drawcard for thousands of domestic and international hunters. This provides an 'extreme wilderness experience' that is highly valued for its solitude, natural quiet, and substantially unmodified landscapes.

Access to the herd is a critical component of deer management. The allocation of hunting opportunities through the ballot system enables hunters to act as caretakers for the Wapiti Area rather than just end-use consumers. This access facilitates the removal of animals to meet ecological objectives, as hunter harvest is a key method used to achieve deer removal targets and promote the regeneration of indigenous flora.

The herd provides a valuable food source. It serves as a sustainable resource of quality, high-protein meat for hunters and communities. The FWF coordinates community initiatives, including the provision of venison to people in need. These initiatives rely on cost-recovery mechanisms, such as wild animal recovery operations, which in turn support the recovery businesses and their supply chain.

Interaction with the herd fosters deep connections with wild spaces and the wider community. The management of the herd has stimulated community cohesion, providing contributors with a sense of belonging, purpose, and achievement. The shared challenge of the area creates an engaged and connected hunting community. Additionally, the herd generates significant economic value, with revenue estimated to exceed \$1.8 million per annum through hunter spending and wild animal recovery operations.

Natural heritage and conservation values

Conservation values are central to the management of the area, where the priority is protecting Fiordland's unique biodiversity. The Fiordland Wapiti Foundation contributes to these values by maintaining a low-density deer population to allow for the regeneration of browsed indigenous flora. Specific conservation values are realised through predator control initiatives, such as the deployment and operation of over 500 traps to protect native species like whio and kea. Furthermore, the management of the area supports the Murchison Mountains Takahē Specially Protected Area through financial support and deer control. Citizen science also plays a role, with hunters conducting native bird surveys to contribute to biodiversity monitoring.

Cultural values

[This section should be completed by iwi and hapū].

Heritage values

The Wapiti Area contains a network of huts that was developed over many years to support hunting, recreation, and park management, with some dating back over a century. These huts, located at sites such as the head of George and Caswell Sounds and the Glaisnock valley, are maintained under a community agreement and represent significant historical interest. The area itself is historically significant as a site of early European exploration, exploitation, and settlement. The wapiti herd is also intrinsically linked to New Zealand hunting folklore, with a history documenting early trophy notoriety and commercial exploitation.

Fiordland National Park forms part of Te Wāhipounamu – South West New Zealand World Heritage Area. This UNESCO World Heritage Area designation recognises the park's international significance alongside Westland Tai Poutini, Aoraki / Mount Cook, and Mount Aspiring National Parks.

Community values

Management of the herd has fostered substantial community collective effort and cohesion, providing contributors with a sense of belonging and purpose. The hunting community acts as caretakers for the environment and engage in many stewardship activities – from trapping to citizen science. This community value is quantified by the approximately 2,600 volunteer hours committed annually to wapiti management, trapping, and hut restoration. The herd also supports wider community benefits, such as the provision of venison to people in need.

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3 Context

The Wapiti Herd

The herd is comprised largely of wapiti–red hybrids, as the two species interbreed and cannot be physically separated within the area. Consequently, there are few, if any, pure-bred wapiti or red deer present. Individual animals possess varying degrees of wapiti traits, and management aims to improve herd genetics by selectively targeting animals with less wapiti-like traits. The herd is currently managed to maintain a low-density population that promotes high-quality animals and trophy potential while mitigating impacts on the environment.

Accordingly, control work by the Department in Fiordland National Park is generally focused on maintaining deer-free areas (such as Secretary and Coal Islands, and the Cleddau valley) and continued intensive suppression to support habitat for the Takahē Recovery Programme in the Murchison Mountains.

Since 2005, the Department has worked closely with the Fiordland Wapiti Foundation on an annual control programme in the Wapiti Area using a combination of recreational hunter effort and coordinated professional control operations. In other areas, the main method of deer removal is commercial wild animal recovery operations and/or recreational hunting.

Intensive control, commercial wild animal recovery operations and community-led programmes have resulted in variable suppression of the deer population over time in Fiordland National Park. While extensive commercial venison recovery significantly reduced deer numbers in the 1970s to 1990s, market conditions have been increasingly unfavourable for commercial operations since then. Resourcing for official control work has also been variable over time.

By contrast, the Fiordland Wapiti Foundation's control programme has resulted in relatively consistent levels of management activity since 2005, with operational costs routinely being covered by recreational hunters and coordinated wild animal recovery operations within the Wapiti Area.

The hunting community

The Fiordland Wapiti Foundation (FWF), a charitable trust established in 1993, leads the hunting community's involvement in the area. Since 2005, the FWF has worked under a community agreement with the Department of Conservation to manage the herd and maintaining huts.

The favoured hunting period is during the bugle or rut, when emboldened bulls are vocal to attract cows. The bugle runs from mid-March to late April, and hunting access during this time has been managed by a ballot administered by the Fiordland Wapiti Foundation for over 20 years. The ballot involves the allocation of hunting opportunities to 25 hunting blocks (as shown on Map 2, Appendix 1) to around 600 recreational hunters. Within this framework, hunter activity within the blocks has been managed across four 10-day periods. The number of entries into the bugle ballot has far exceeded the hunting block allocations available for the past 10 years. Hunters voluntarily support efforts to preserve the genetic integrity of the herd and are willing to pay for these limited opportunities.

Geographical context

Fiordland National Park covers over 1.2 million hectares, with the Wapiti Area covering approximately 190,700 hectares (15%) of the park. Fiordland National Park is bounded by Lake Te Anau to the east and the Tasman Sea to the west, featuring deep fiords and rugged terrain. The Wapiti area includes the 123,800 hectare Glaisnock Wilderness Area, which is renowned for its unmodified landscapes and solitude. The remainder of the area falls within the 'Western Remote' visitor setting under the Fiordland National Park Management Plan 2007.

Within the Wapiti Area – particularly in the Nitz Creek, Glaisnock River, Lugar Burn, Stillwater Creek, Doon River and Edith River catchments – there are comparatively broad U-shaped valleys, with open areas of grassland breaking up vast tracks of forest and wetland. The western coast of the Wapiti Area is broken by large fiords, from Te Hāpua / Sutherland Sound in the northwest to Hāwea / Bligh, Te Houhou / George and Taitetimu / Caswell Sounds in the centre west and Taiporoporo / Charles Sound at the southern extent.

The terrain rises to nearly 2,000 metres in the Franklin and Stuart Mountains.

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Ecological context

The area features complex and unique indigenous vegetation, including ancient southern beech and podocarp forests that have adapted to local climate and soil conditions. Throughout the Wapiti Area, the treeline is low (850–1,000 metres), with a discontinuous zone of scrub, tussock grasslands and sensitive alpine herbfields extending up to around 1,500–1,600 metres. While rock and snow predominate at higher elevations, plants can still be found in favourable niches.

The Wapiti Area does not contain any ecological management areas or units that have been identified by the Department's existing statutory management plans, but it is home to indigenous endemic birds, including pīwauwau / rock wren, whio / blue duck, mōhua / yellowhead, kākā, kea, tokoeka / southern brown kiwi and tawaki / Fiordland crested penguin. Indigenous vegetation across the Wapiti Area is complex and unique, with wet mosses, liverworts, lichens and filmy ferns on the ground and tree trunks. The forest understorey includes diverse shrub species, including karamu / coprosma, kāpuka / broadleaf, puahou / five finger and various ferns. Tawhai / silver beech and tawhairauriki / mountain beech are widespread in the canopy, and rimu, mataī, miro and tōtara can be prominent in areas near lakes and fiords.

Historical context

Fiordland National Park became a national park in 1952 and forms a part of Te Wāhipounamu – South West New Zealand World Heritage Area. Fiordland is a sacred place to local iwi and hapū, and was a site of early exploration, exploitation and settlement of New Zealand by Europeans.

Ten wapiti bulls and eight cows were released into Fiordland National Park at the head of George Sound in 1905. Ten of these were gifted to New Zealand by US President Theodore Roosevelt. The animals were initially protected to allow establishment, with the first hunting licence issued in 1923. In the 1970s to 1990s, extensive commercial venison recovery significantly reduced deer numbers. Since 2005, the FWF has implemented a consistent control programme using recreational hunter effort and professional operations.

Fiordland National Park became a national park in 1952 and covers over 1.2 million hectares.

It is treasured for its pristine and dramatic landscapes, rich indigenous biodiversity, and unique flora and fauna. Its forest cover of ancient and mature southern beech and podocarps contains unique communities of native flora that are adapted to the local climate and soil conditions. In the subalpine zone, tussock grasses and daisy species thrive, and higher in the alpine zone, there are herbfields.

This Park, along with Westland Tai Poutini, Aoraki / Mount Cook and Mount Aspiring National Parks, forms part of Te Wāhipounamu – South West New Zealand World Heritage Area.

Fiordland is a sacred place that is bound up in the heritage of the three principal historical iwi of Te Waipounamu (the South Island): Waitaha, Ngāti Māmoë and Ngāi Tahu. The area was also one of the sites of early exploration, exploitation and settlement of New Zealand by Europeans.

The Wapiti Area covers approximately 15% of Fiordland National Park's total area, or 190,700 hectares (including lakes and waterbodies). The area is bounded by Lake Te Anau to the east and deep fiords and the rugged Tasman Sea to the west, with the Franklin and Stuart Mountains rising to nearly 2,000 metres above sea level in the central area.

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Within the Wapiti Area — particularly in the Nitz Creek, Glaisnock River, Lugar Burn, Stillwater Creek, Doon River and Edith River catchments — there are comparatively broad U-shaped valleys, with open areas of grassland breaking up vast tracks of forest and wetland. The western coast of the Wapiti Area is broken by large fiords, from Te Hāpua / Sutherland Sound in the northwest to Hāwoa / Bligh, Te Houhou / George and Taitetimu / Gaswell Sounds in the centre west and Taiporoporo / Charles Sound at the southern extent.

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The Wapiti Area includes the 123,800-hectare gazetted Glaisnock Wilderness Area, which is renowned by self-reliant and highly experienced recreationists for its substantially unmodified landscapes, solitude, natural quiet and limited recreational facilities. The remainder of the area is within the 'Western Remote' visitor setting described in the *Fiordland National Park Management Plan 2007*, which has similar recreation and wilderness values to those found in the adjoining Glaisnock Wilderness Area.

Conservation and introduced species

Introduced animal species, including wapiti, can have significant and long-lasting impacts on an area. Deer browse can suppress forest regeneration, change plant communities and threaten biodiversity. Deer are selective feeders, so where they negatively affect native plant communities, species that are preferred by deer suffer more damage than species that are avoided.

Research indicates that regeneration is possible with intensive management, but this is generally slow, location specific and costly to sustain. Plant growth also depends on light and nutrient availability, so competition from deer-avoided species may slow down the recovery process, leading to long-term changes in forest composition.

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

4 Managing wapiti for hunting purposes

Managing the herd as a Herd of Special Interest (HOSI) is the only management tool that specifically provides for game animals to be managed for hunting purposes on public conservation land. This approach allows for a focus on hunting experiences and outcomes, such as improving herd genetics and trophy characteristics, while ensuring conservation values are protected.

The management strategy involves a distributed responsibility model between the FWF, the Game Animal Council (GAC), and the Department of Conservation. Key objectives include:

- Coordinating recreational hunting to maximise opportunities and satisfaction while encouraging harvest that supports genetic integrity.
- Managing the herd to a level compatible with promoting the regeneration of browsed indigenous flora.
- Building strong partnerships to support non-government funding and voluntary contributions.

Operational strategies include the use of a ballot system to manage hunter activity across 25 hunting blocks during the bugle period. This is complemented by coordinated professional control operations and Wild Animal Recovery Operations (WARO) to meet deer removal targets based on vegetation monitoring. The management plan encourages hunters to act as caretakers, fostering a conservation mindset where they contribute to the protection of indigenous flora and fauna.

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

Managing the Fiordland Wapiti Herd of Special Interest for hunting purposes enables management to also focus on hunting experiences and outcomes, which includes improving herd genetics via selective targeting of Fiordland wapiti that have less wapiti-like traits. Over time, this can improve herd quality and promote animal and trophy characteristics that are sought by hunters.

Adoption of the Fiordland Wapiti Herd of Special Interest management approach is intended to encourage collective and concerted action for Fiordland wapiti management and the conservation of indigenous flora and fauna in the Wapiti Area. It seeks to do this by recognising and providing for a range of values, conservation outcomes, communities and recreational activities, and by building on recent collaborative efforts between the Fiordland Wapiti Foundation and the Department to improve Fiordland wapiti management. This, in turn, is expected to expand the number of people contributing to conservation efforts more broadly. Working with hunters and other interested parties to increase understanding of the impacts Fiordland wapiti and other introduced species have on indigenous species can contribute to hunters adopting a conservation mindset when hunting.

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It is important to recognise the contribution hunters can and, in particular areas, already do make to conservation. The work of the Fiordland Wapiti Foundation in the Wapiti Area reflects this – through both management of the Fiordland wapiti population itself and wider conservation efforts, such as predator trapping and control work, hut restoration, and support for the Murchison Mountains Takahē Specially Protected Area.

Monitoring, research and reporting to support management

Monitoring is an important aspect of herd management, as it provides information that allows the effectiveness of management actions to be evaluated and the objectives for managing Fiordland wapiti for hunting purposes to be met. A range of methods and tools are available to be used and adapted annually to ensure that the most appropriate method is being implemented to build on the data already collected within the timeframe in which the information is needed.

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

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

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

Deer control is expensive, with eradication and the maintenance of deer-free areas costing significantly more than suppression (population reduction) activities over the same area. Therefore, prioritisation is undertaken, and emphasis is placed on controlling deer to protect priority areas and species.

Accordingly, control work by the Department in Fiordland National Park is generally focused on maintaining deer-free areas (such as Secretary and Coal Islands, and the Cleddau valley) and continued intensive suppression to support habitat for the Takahē Recovery Programme in the Murchison Mountains.

Since 2005, the Department has worked closely with the Fiordland Wapiti Foundation on an annual control programme in the Wapiti Area using a combination of recreational hunter effort and coordinated professional control operations. In other areas, the main method of deer removal is commercial wild animal recovery operations and/or recreational hunting.

Intensive control, commercial wild animal recovery operations and community-led programmes have resulted in variable suppression of the deer population over time in Fiordland National Park. While extensive commercial venison recovery significantly reduced deer numbers in the 1970s to 1990s, market conditions have been increasingly unfavourable for commercial operations since then. Resourcing for official control work has also been variable over time. By contrast, the Fiordland Wapiti Foundation's control programme has resulted in relatively consistent levels of management activity since 2005, with operational costs routinely being covered by recreational hunters and coordinated wild animal recovery operations within the Wapiti Area.

Hunting and recreation values

Fiordland wapiti herd

The Fiordland wapiti herd holds historic significance to many New Zealanders and is a New Zealand hunting icon. Ten wapiti bulls (males) and eight wapiti cows (females) were released into Fiordland National Park at the head of Te Houhou / George Sound in 1905. Ten of these animals were gifted to New Zealand from the United States of America by then President Theodore Roosevelt and the remainder were purchased by the Tourism Department. Wapiti were initially protected to enable them to breed and establish in the area, with the first hunting licence being issued in 1923.

Red deer (*Cervus elaphus*) are also present in the Wapiti Area. It is not possible to physically separate the species within the Wapiti Area, and the two species interbreed. As a result, there are very few, if any, pure-bred wapiti or red deer present in this area. The herd largely comprises wapiti-red hybrids, with individual animals having more or less wapiti traits.

Fiordland wapiti have been sought after trophy animals for many years, as they produce the largest round antler trophies of any deer species in New Zealand and the only wild hunting opportunity for wapiti-type deer in the Southern Hemisphere. Hunters voluntarily support efforts to preserve the genetic integrity of the Fiordland wapiti herd.

Hunting and managing for hunting purposes

Hunting Fiordland wapiti is a unique experience in the challenging yet rewarding environment of this remote part of Fiordland National Park. With no road access and few huts, the area provides an extreme wilderness experience and is a drawcard for thousands of hunters each year.

The favoured hunting period is during the bugle or rut, when emboldened bulls are vocal to attract cows. The bugle runs from mid-March to late April, and hunting access during this time has been managed by a ballot administered by the Fiordland Wapiti Foundation for over 20 years. The ballot involves the allocation of hunting opportunities to 25 hunting blocks (as shown on Map 2, Appendix 1) to around 600 recreational hunters. Within this framework, hunter activity within the blocks has been managed across four 10-day periods. The number of entries into the bugle ballot has far exceeded the hunting block allocations available for the past 10 years.

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Monitoring, research and reporting to support management

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

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

Culture, heritage, community and stewardship values

There are a range of views on Fiordland wapiti and how they should be managed. Some see Fiordland wapiti as an introduced species and so think that the animals should be removed. Others seek to realise the value of the herd as a part of the contemporary cultural and community context of Fiordland National Park. To support hunting, recreation and management of the Park, a network of huts was developed in the Wapiti Area over many years, with some dating back over a century. Today, huts remain at the head of George and Caswell Sounds, on the shores of Lakes Hankinson and Thomson, and in the Glaisnock and Worsley valleys. The Fiordland Wapiti Foundation has worked closely with the Department to maintain the huts under a community agreement since 2005. This builds on conservation projects undertaken by the Foundation to help protect indigenous species and habitats in the Wapiti Area, including:

- the deployment and operation of over 500 predator control traps;
- a range of native bird and animal surveys; and
- the removal of chamois when sighted during deer control and recovery operations.

As with the management of Fiordland wapiti, the Fiordland Wapiti Foundation's conservation and facility maintenance work has contributed to the management and preservation of conservation, recreation, cultural and heritage values associated with the Wapiti Area, enabling the Department to focus its resources on other priority areas.

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~~Work by the Fiordland Wapiti Foundation and other groups that are committed to undertaking conservation activities contributes to the management and protection of public conservation land and should be acknowledged and recognised.~~

~~This reflects the values many associate with the Wapiti Area, particularly the Glaisnock Wilderness Area, which is highly valued for its remoteness and its landscape, which is relatively unmodified by human activity.~~

~~Most activities other than hunting in this part of Fiordland National Park occur on the boundaries of the Wapiti Area during the summer period and outside the peak hunting times. There is very little concessionaire activity in the Wapiti Area, particularly in the Glaisnock Wilderness Area, where applications to undertake commercial activity can only be granted where they are provided for in the *Fiordland National Park Management Plan 2007*.~~

~~The George Sound Route within the Wapiti Area is managed for its remote almost wilderness experience, with users needing to be experienced and self-reliant.~~

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35 Objectives and strategies

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

Objectives

Objective	Description
1	Manage the herd to sustainably produce high-quality bulls for hunters to take during the bugle and enhance recreational hunting opportunities and experiences. Fiordland wapiti are managed in a manner that allows for the maintenance of natural biodiversity by restoring ecological processes and communities of browsed indigenous flora and preventing the loss of indigenous species from their current range.
2	Maintain or enhance the current condition of vegetation adversely affected by wapiti browse through management of the wapiti herd. The Fiordland wapiti hunting experience is enhanced, and the Fiordland wapiti herd produces high-quality bulls for balloted hunters to take annually during the bugle.
3	Strengthen the Treaty partner relationship with Papatipu Rūnanga and Te Rūnanga o Ngāi Tahu through regular engagement to identify shared aspirations and opportunities for involvement. Generate sufficient revenue through partnerships and sponsorships, seek to recover costs from the hunting community, and in-kind support is increased to ensure the delivery of this Plan is wholly or largely self-funded.
4	Build or maintain hunter and community involvement in: <ul style="list-style-type: none"> a. initiatives that enhance the benefit, use and enjoyment of the public in the Wapiti area. b. conservation initiatives that promote the health and wellbeing of indigenous plants and animals.
45	Build or maintain sources of income, partnerships, and in-kind support that support and advance the other objectives of this HMP. Engage the hunting community in the management of Fiordland wapiti and the Wapiti Area so the community provides support for local conservation and social initiatives.
56	Implement an adaptive management framework based on monitoring and research. The Treaty partner relationship with Papatipu Rūnanga and Te Rūnanga o Ngāi Tahu is strengthened, and opportunities for Papatipu Rūnanga to be involved and participate in the management of Fiordland wapiti are increased.
6	Knowledge and understanding of the dynamics between Fiordland wapiti and indigenous species and ecosystems are improved.
7	Monitoring enables adaptive management and demonstrates whether the management of Fiordland wapiti is achieving the objectives and strategies of this Plan.
8	Research supports and enhances management of Fiordland wapiti and the Wapiti Area.
9	Public reporting provides information on whether the Plan is achieving the Objectives.

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Strategies

Strategy	Description
1	Use a range of tools to manage the Fiordland Wapiti Herd of Special Interest and improve the hunting experience.
<i>General</i>	
1.1	Set and review annual Fiordland wapiti control targets to align management of the populations with the objectives and strategies of this Plan.
1.21.1	Coordinate and manage recreational hunting and commercial and professional control operations/ herd management activities to selectively remove Fiordland wapiti in a way that: <ul style="list-style-type: none"> a) protects and enhances the hunting experience during the annual bugle; b) optimises genetic selection and minimises hybridisation; c) maintains a male-biased population, with a higher proportion of older males, sex ratio of 1.1 bulls per cow; and

d) achieves a proportional increase in older bulls in the herd.

Recreational hunting

- 4-31.2 Operate a hunting authorisation system for hunting Fiordland wapiti within the Wapiti Area, and require hunters to obtain an authorisation and adhere to its conditions.
- 4-41.3 Specify hunting conditions by notice in the Gazette, including conditions relating to the periods and times when Fiordland wapiti may be hunted and specific dates that apply to the bugle period.⁸
- 4-51.4 Use a ballot and block system during the bugle period to allocate authorisations and manage recreational hunting of Fiordland wapiti.
- 4-61.5 Allow recreational hunting outside the bugle period that focuses on Fiordland wapiti with fewer wapiti-like traits and cows rather than bulls.
- 4-71.6 ~~Seek to e~~Charge fees to hunt Fiordland wapiti to cover costs associated with managing the Fiordland Wapiti Herd of Special Interest, such as advertising, hunter education and management, and animal management and control activities undertaken throughout the year.
- 4-81.7 Use any revenue generated through fees, additional to that required for management of the Fiordland Wapiti Herd of Special Interest, for conservation initiatives within the Wapiti Area or other areas of Fiordland National Park.

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Commercial recovery and professional ~~control-herd management~~ operations

- 4-91.8 Use authorised commercial recovery and professional ~~control-herd management~~ operations as part of Fiordland wapiti management, applying the following criteria:
- ~~Seek to i~~ncentivise commercial recovery contributions to ~~control-herd management~~ targets where necessary through subsidies funded by fees, sponsorship and other commercial partnerships associated with the Fiordland Wapiti Herd of Special Interest.
 - Focus professional ~~control-herd management~~ operations on difficult-to-access areas where recreational hunting and commercial recovery operations cannot meet ~~control-herd management~~ targets, or doing so is not commercially viable.
 - ~~Seek to m~~Meet professional ~~control-herd management~~ operation costs through fees, sponsorship and other commercial partnerships associated with the Fiordland Wapiti Herd of Special Interest.
 - Focus commercial recovery and professional ~~control-herd management~~ operations on deer with the least wapiti-like characteristics.

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

Monitoring

- 2.1 Develop and implement a monitoring programme that at appropriate geo-temporal scales, measures wapiti impacts, herd health and quality, and the benefits achieved through other management activities. This should include the following:
- Ecological monitoring that covers both alpine areas (above the bushline) and forested areas (below the bushline), which may include, but is not limited to, the following methods and tools:
 - Seedling ratio index
 - Permanent 20 x 20 metre plots
 - Alpine deer browse
 - ~~iv. Faecal pellet counts~~
 - Exploring the use of new monitoring methods, tools and technologies, and seeking the views of Papatipu Rūnanga, the ~~Southland Conservation Board~~ Game Animal Council and the Department prior to their use in the Wapiti Area.
 - Monitoring the hunter harvest, ~~which may include, but is not limited to, monitoring the hunter contribution to control targets~~ and the age and length of jaws to determine herd age structure, size and condition of animals and antlers, genetic integrity and growth rates.

⁸ Game Animal Council Act 2013, section 18(2).

x) Changes to monitoring methods, if made, must consider integration or comparability with previous monitoring tools to enable long-term trend analysis and reporting.

d) Monitoring voluntary and partnership contributions to the key management objectives.

e) Monitoring hunter harvest and satisfaction with the management of Fiordland wapiti, including, but not limited to the:

i. quality of Fiordland wapiti available; and

ii. ballot and authorisation process, including the information available to hunters prior to and after their hunting trips.

2.2 Undertake ecological monitoring in accordance with relevant standards used or set by the Department using best practice methods and standards.

2.3 Include the results from all monitoring in an annual report (see strategy 4 below).

Research

2.4 Seek opportunities to uUndertake or support research relevant to the management of Fiordland wapiti and/or their effects within the Wapiti Area including research on the resilience of the herd and the impact of herd management mechanisms.

2.5 Explore opportunities with Papatipu Rūnanga to incorporate mātauranga Māori (Māori knowledge) in management and research activities, and increase understanding of the impact of Fiordland wapiti on taonga species.

2.6 Undertake relevant research including research related that may relate to, but is not limited to, the:

a) changes in herd health and genetic composition of the Fiordland wapiti herd;

b) spread, behaviours and effects of Fiordland wapiti on indigenous flora, and how this compares with that of other deer species;

c) movement patterns and habitat utilisation of Fiordland wapiti within the Wapiti Area; and

d) potential impacts of aerial hunting on the movements and habitat utilisation of Fiordland wapiti.

2.7 Address relevant research findings in an annual report.

3 Foster partnerships and community stewardship.

Partnerships

3.1 Seek to dDevelop partnerships and commercial opportunities associated with- Fiordland wapiti to help meet the costs of implementing this Plan.

3.2 Engage with Papatipu Rūnanga when developing partnerships with others to ensure that the interests and values of Ngāi Tahu in relation to such partnerships are considered.

3.23.3 Work with parties who are involved in the management of deer populations adjacent to the Wapiti Area to support effective herd management.

3.33.4 Actively promote the Fiordland wapiti hunting experience to domestic and international markets.

Stewardship

3.43.5 Provide educational opportunities for communities, hunters and interested parties about the:

a) contribution that managing Fiordland wapiti for hunting purposes makes to improving forest and herd health;

b) impacts of Fiordland wapiti on the environment and conservation values, and what the objectives of this Plan are working to achieve;

c) selection of Fiordland wapiti when hunting to improve conservation, herd health and recreational outcomes;

d) Fiordland wapiti hunting experience;

e) visitor requirements and behaviours in Fiordland National Park; and

f) requirements for hunting safely.

3.53.6 Seek opportunities to work with Papatipu Rūnanga to the extent they would like, when developing hunter authorisation, education and promotional materials to ensure that Ngāi

Tahu values and cultural information are recognised and provided for.

- 3-63.7 ~~Seek opportunities to w~~Work with Papatipu Rūnanga, ~~to the extent they would like,~~ to ensure that management activities recognise and reflect Ngāi Tahu values.
- 3-73.8 Provide a range of opportunities for the hunting community and other interested parties to actively contribute to Fiordland wapiti herd management ~~and control~~ activities.
- 3-83.9 Work with local communities in Te Anau and Southland to develop opportunities to participate in activities such as open days, hunter training and education days.
- 3-93.10 Work with the commercial and recreational hunting communities to facilitate and support social initiatives.
- 3-103.11 ~~Seek to p~~Provide a range of opportunities for the hunting community and other interested parties to contribute to wider conservation initiatives within the Wapiti Area, such as predator trapping and control programmes and the maintenance of historic huts and public recreation infrastructure.

4 Undertake annual planning and reporting on management activities.

Annual operational plan

- 4.1 Develop an annual operational plan for the activities planned for the coming year to help achieve the objectives. This operational plan should include, but is not limited to:
 - a) setting ~~operational areas and annual population-herd management and control targets and focus areas, including desirable herd composition, including the sex-ratio of Fiordland wapiti~~ and specific locations within the Wapiti Area ~~for control~~;
 - b) outlining ~~herd management activities, methods to achieve annual herd management targets, such as managed recreational hunting, commercial wild-animal recovery operations and professional control operations~~;
 - c) determining the annual ballot process (including ballot times and a breakdown of block dates);
 - d) identifying any other planned work or initiatives; and
 - e) identifying parties or entities responsible for management activities and related timeframes.

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Annual report

- 4.2 Prepare and publish an annual report detailing the activities undertaken in the previous year, including, but not limited to:
 - a) overall herd management ~~activities~~, including the number of Fiordland wapiti ~~controlled/harvested~~, the ~~control-herd management~~ method(s) used, areas where ~~control-herd management~~ occurred and the ~~control-herd management~~ effort;
 - b) results and outcomes of monitoring activities, such as ecological monitoring and hunter participation and satisfaction evaluations;
 - c) key metrics of the ballot process and related outcomes, such as the total numbers of ballot entrants, bugle participants and Fiordland wapiti taken during the ballot period, and the condition and quality of the animals;
 - d) sponsorships and commercial partnerships;
 - e) hunter training, education and community initiatives;
 - f) wider conservation activities supported; and
 - g) opportunities to improve ~~herd~~ management going forward.
- 4.3 ~~Include financial reporting in the annual report in relation to:~~
 - a) ~~ballot processes and fees;~~
 - b) ~~Fiordland wapiti control and other conservation activities;~~
 - c) ~~overall expenditure on management of the Fiordland Wapiti Herd of Special Interest and contributions from the Department and/or central government; and~~
 - d) ~~monitoring.~~
- 4.4 ~~Work with the Department when preparing the annual report prior to its finalisation and public release.~~
- 4-54.3 Present the annual report to Papatipu Rūnanga ~~and the Southland Conservation Board,~~ if requested.

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2 Compliance, review and enforcement

Plan compliance and review

This Plan binds the Game Animal Council.

It must be reviewed at intervals of not more than five years, in accordance with section 19 of the Game Animal Council Act. Unless otherwise directed by the Minister for Hunting and Fishing, Plan reviews are to be initiated early in the fourth year of a five-year Plan cycle.

Where monitoring and reporting indicate that changes to this plan are required to support the effective adaptive management of the herd, a targeted review may be initiated earlier.

The review will consider annual reports, monitoring data and results, and relevant research as part of an assessment of whether the Plan's objectives and strategies are delivering the benefits expected to be gained by managing the Fiordland wapiti for hunting purposes. The review will also address the overriding considerations under the following circumstances:

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

Minor or administrative changes to the HMP will not require a full assessment against the overriding considerations.

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

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

Fiordland Wapiti Herd of Special Interest compliance and enforcement

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

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

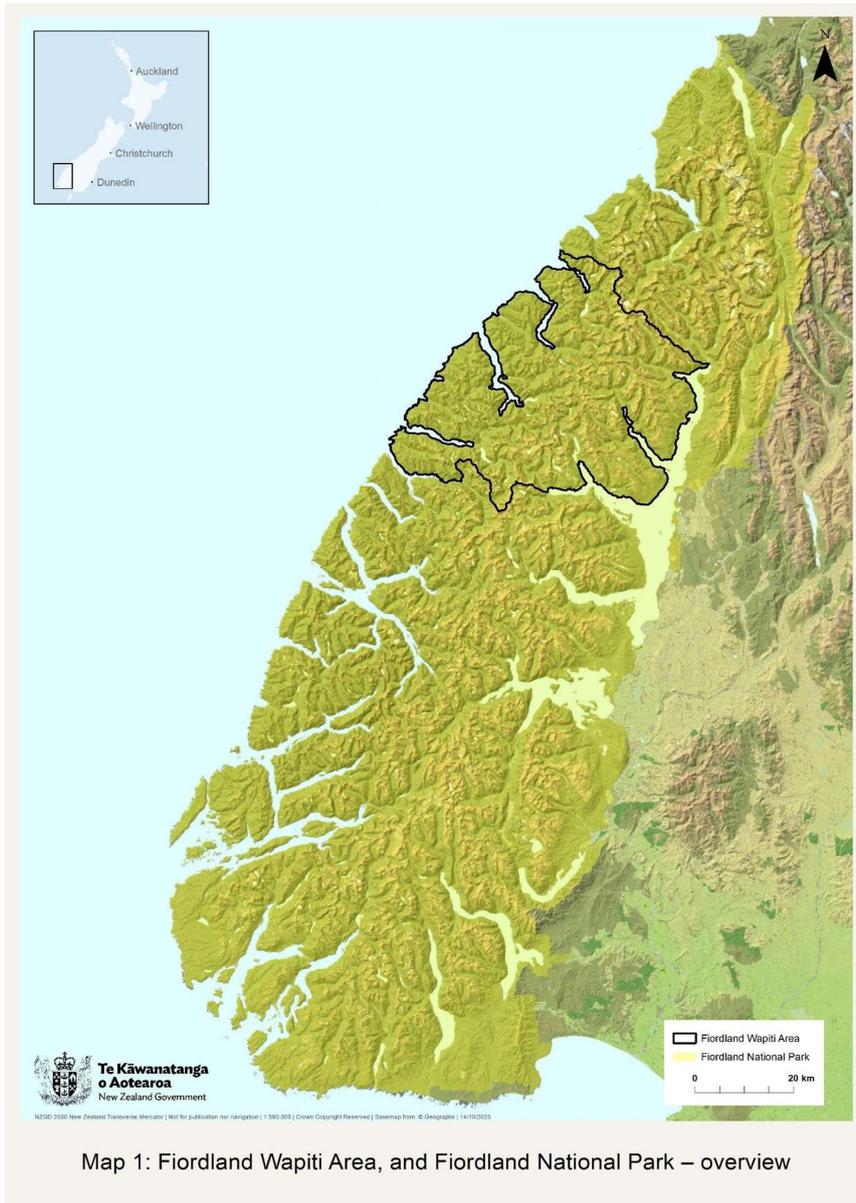
A person who hunts or kills any animal in a designated area for a herd of special interest without the appropriate authorisation, licence or permit is liable on conviction to a fine not exceeding \$5,000.⁹

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⁹ Game Animal Council Act 2013, section 30(1).

Appendices

Appendix 1: Maps





Map 2: Fiordland Wapiti Area – close-up and ballot blocks

Appendix 2: Glossary

Authorisation

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

Ballot and block system

An annual lottery process that is used to allocate pre-defined hunting areas to hunters through a random ballot draw. Those who are successful in a ballot receive an authorisation to hunt in a particular block for specified dates within the ballot period (for example, a 10-day period). Ballot systems can be used to protect and enhance the hunting experience during peak times.

Bugle

A distinctive, high-pitched, whistle-like sound produced by bull wapiti during the wapiti breeding season to attract cows. The breeding season generally occurs from mid-March to late April in the Wapiti Area and is known amongst hunters as the 'bugle period'. This is when wapiti bulls are most vocal and less cautious, which enhances the hunting experience.

Commercial hunting

Hunting undertaken by professional hunters for their livelihood and intended to maximise the take or kill of animals. This does not include guided recreational hunting, transportation of recreational hunters or other means of assistance for recreational hunting for which a consideration is paid.

Community

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

Conservation board

An independent body established under section 6L of the Conservation Act 1987. The primary functions and powers of conservation boards are set out in sections 6M and 6N of the Conservation Act and section 30 of the National Parks Act 1980. These functions include advising the New Zealand Conservation Authority or Director-General of the Department of Conservation on conservation matters of importance in their area. They also have an important conservation advocacy role. The relevant conservation board for this Plan is the Southland Conservation Board.

Control target

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

Fiordland wapiti

Hybrids between wapiti deer (*Cervus canadensis*) and red deer (*Cervus elaphus*) that occur within the Wapiti Area and are subject to the Gazette notice designating the Fiordland Wapiti Herd of Special Interest.

Fiordland Wapiti Herd of Special Interest Area (Wapiti Area)

The area within Fiordland National Park that is subject to the Gazette notice designating the Fiordland Wapiti Herd of Special Interest, as shown on the maps in **Appendix 1**. This area reflects the Wapiti Hunting Area identified on Map 7 – Visitor Setting in the *Fiordland National Park Management Plan 2007*.¹⁰

Herd management activities

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

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Herd management target

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

Herd of special interest

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

¹⁰ doc.govt.nz/fnp-management-plan

purposes while ensuring that conservation values continue to be protected.

Indigenous flora

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

Minister for Hunting and Fishing

The Minister responsible for the Game Animal Council Act 2013.

Professional ~~control-herd management~~ operation

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

Recreational hunting

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

World Heritage Area

A site designated under the United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage Convention as being of outstanding universal value for its cultural or natural heritage.

Wild animal recovery / venison recovery

Wild animal recovery refers to activities involving the use of an aircraft to search for, shoot or immobilise wild animals and the recovery of those wild animals (whether dead or alive) or any part of those animals. Venison recovery refers to the above activities when specifically recovering venison meat from a dead deer.

Wilderness area

Any part of a national park that has been set apart as a wilderness area under section 14 of the National Parks Act 1980.

Karena Joyce-Paki

Submission Details

Eirwen Harris Mitchell

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

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Kia Ora MP James Meager, and decision makers,

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

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

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

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

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

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

Ngā mihi nui,

Kārena Joyce-Paki

Chris Keeling - Te Uru Kahika

Submission Details

Eirwen Harris Mitchell

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

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

Kia ora koutou,

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

Ngā mihi nui,

Chris Keeling,
Te Uru Kahika, Biodiversity & Biosecurity

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

5 DECEMBER 2025

Tēnā koutou katoa,

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

SUBMISSION POINTS

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

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

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

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

STATUS OF THIS SUBMISSION

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

Patrick Whaley, Biomanagers
Te Uru Kahika

s9(2)(a)

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

Nāku iti noa, nā



Steve Ruru

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

David Klein

Submission Details

Eirwen Harris Mitchell

From: David Klein s9(2)(a)
Sent: Monday, 8 December 2025 4:00 pm
To: wapitiHOSIHMP; SikaHerdOfSpecialInterest@doc.govt.nz
Subject: Feedback on HOSI

Categories: Green category

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Kia ora,

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

David Klein

s9(2)(a)

s9(2)(a)

s9(2)(a)

Joseph Laybourn

Submission Details

Eirwen Harris Mitchell

From: Joe Laybourn s9(2)(a)
Sent: Monday, 8 December 2025 9:36 am
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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Joseph Laybourn

s9(2)(a)

Kia ora,

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,

Joe.

Shaun Lee

Submission Details

Eirwen Harris Mitchell

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

Categories: Green category

Hi Eirwen

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

Ngā mihi,
David

David Owen

s9(2)(a)

s9(2)(a)

www.doc.govt.nz



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

Kia ora James,

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

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

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

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

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

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

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

Ngā mihi

s9(2)(a)

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

Graeme Loh

Submission Details

Submission on HOSI for Wapiti

Graeme Loh

8 December 2025

I write in opposition to this proposal because it will not enhance the future of our native animals and plants and it will distract resources and attention from nature conservation and devalue our international standing for quality management of National Parks and World Heritage Areas.

I am not a trophy hunter, mainly pest control and 'pot' hunting. I have spent many years in South Island forests and observed the very low numbers of deer in the 1970's due to the venison gold rush, then rising to very high and much more dispersed numbers of deer nowadays. I have only spent a small amount of time on the periphery of the 'Wapiti area', but a considerable amount of time in other parts of Fiordland, Waitutu, and South Westland, including weeks of some of the islands. I have observed the pervasive impact of deer in these areas.

Conflict of responsibilities of the Minister of Conservation and the Minister of Hunting. This is a prescription for confusion and waste. Fiordland is a National Park and within the South Westland World Heritage Area; that in my mind defies the priorities as being nature conservation before all else.

Legislation is not yet complete; the current legislative proposals are seriously retrograde to our biodiversity protections. I believe the proposal document is thus premature.

Deficiencies in the proposal document.

There is no recognition of the process that sustains deer at numbers too high to allow establishment of palatable trees. Deer get through hard times eating leaf fall from mature trees of palatable species. I have seen dramatic examples of this in the Catlins where there is a trench around the pedestal of an old *Griselinia* where deer have circled it through winter to pick up every fallen leaf. Hunters know this too and engage in the practice of felling branches of palatable species to focus their quarries' activities. This sustenance of deer by leaf fall is what frustrates efforts to reduce their numbers to allow regeneration. The proposal does not recognize nor address this problem.

On page 2, the plan makes a general assertion "Research indicates that regeneration is possible with intensive management". This is not supported nor referenced and I suggest that it leads to an over optimistic list of management prescriptions.

There is no mention of the landscape processes that precipitate regeneration. Massive slips on the very steep valley walls are common and associated with frequent storm events. What

examination of vegetation colonization and the role of deer has there been? River deltas in lakes and Fiords are another habitat that sees great flux where deer may have a particular impact.

The proposal does not thoroughly present the natural values and special species and ecosystems in the area. Features such as sand dunes.

The proposal does not clearly identify the palatable species and their status and trajectory in the area.

Are there fenced deer enclosure plots in the area?

I would like to draw to your attention the report by Colin Ogle in “Wildlife and wildlife habitat values of Waitutu Forest, Western Southland” by GP Elliott, 1985, which describes the flora of a shelf in Lake Poteriteri that had not yet been discovered by deer.

There is no recognition of the significant role of browsers on the change in the forest canopy make up. There is a series of reports from the Ecology Division studies in the Orongorongo Catchment and I believe there are further formal studies in the Ruahines. They point out that the complete removal of browsers is necessary to avoid local extinctions of canopy trees. I would expect a full biography of such literature in a proposal to maintain deer in Fiordland National Park.

The proposal is not placed in the context of commercial trophy opportunities that are available in Otago and Canterbury. It is clear from the advertising by these ‘safari’ operations that the easier climate and easy management produces extraordinary trophies. Fiordland is not the only place where trophies are available. Do these ‘safari’ operations have less environmental impact than Fiordland?

There is no mention of the aerial pesticide application. No mention of 1080 as an essential toxin for broad scale vertebrate control. I do appreciate that the Foundation recognizes that culling is essential for maintaining antler quality and that possum control and mustelid control is an essential management for ecosystem health and regeneration. A realistic plan would include the aerial 1080 tool.

There is no mention of the fossil fuel derived CO² emissions that maintaining this recreation entails. We are now in an era where the discretionary use of fossil fuels will be questioned and their use more and more confined to essential work. The take of deer by recreational hunting is an insignificant benefit to reducing CO² emissions.

Other Comments

I am surprised that there is no review of the size of the Wapiti Area, nor of the size of the ‘blocks’. Both seem extraordinarily large, of a scale that is hard to manage.

Recommendations

Do not give statutory and regulatory force to this plan

Explicitly give authority to the Conservation Authority to overview any wapiti plans and the power to veto them where necessary.

Explicitly give the Minister of Conservation primacy over the Minister of Hunting and Fishing so the MoH&F is advisory to the MoC.

Manage within the objectives of the Fiordland National Park Management Plan and National Parks General Policy.

Identify specific areas of natural values and sensitivity.

Set out exclosure plots in areas that have been disturbed by landslides and flooding where the rate of change is rapid.

Endorse the use of aerial 1080 in vertebrate control operations.

Encourage aerial 'cull to waste' to reduce deer numbers efficiently.

Conclusion

Trophy hunting of wapiti is better done elsewhere.

Graeme Loh

s9(2)(a)

Submitter 197

Submission Details

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

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

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

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

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

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

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

Wild Animal Control Act,

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

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

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

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

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

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

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

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

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

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

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

introduced plants and animals.

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

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

Carlos McDonald

Submission Details

Eirwen Harris Mitchell

From: Carlos McDonald s9(2)(a)
Sent: Monday, 8 December 2025 10:19 am
To: wapitiHOSIHMP

Categories: Green category, Orange category

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

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

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

Thank's Carlos McDonald

Don McErlich

Submission Details

Eirwen Harris Mitchell

From: Don McErlich s9(2)(a)
Sent: Friday, 5 December 2025 9:17 pm
To: wapitiHOSIHMP
Subject: Wapiti and Sika HOSI management plan submission

Categories: Green category

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

Kia ora,

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

1. Overall position

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

2. Why these herds matter

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

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

3. Community-led management

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

4. Funding

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

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

Keep it simple.

6. Operational plan

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

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

7. Monitoring

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

8. Roles and responsibilities

Give tasks to the groups with the right experience.

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

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

9. Tone of the plan

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

Final thoughts

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

Thanks for the chance to submit.

Don McErlich

s9(2)(a)

Rick McGovern-Wilson - New Zealand Conservation Authority

Submission Details

Eirwen Harris Mitchell

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

Importance: High

Categories: Green category

Kia ora

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

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

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

Ngā mihi
Rick

Dr Rick McGovern-Wilson

NZCA Executive Officer
Governance and Government Services Unit | Public Affairs Group
Department of Conservation—*Te Papa Atawhai*

DDI: [REDACTED]

E: [REDACTED]

www.doc.govt.nz/conservation-authority

CONSERVATION AUTHORITY

TE POU ATAWHAI TAIAO O AOTEAROA

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

SUBMISSION FROM THE NEW ZEALAND CONSERVATION AUTHORITY

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

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

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

NZCA Submission

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

Overarching matters

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

Overall Objectives

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

Funding models

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

The development of National Parks and why they are important

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

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

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

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

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

4. National Park Act 1980

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

5. The Conservation Act 1987

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

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

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

Role of the Conservation Authority

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

Risks and mitigations

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

Consideration of alternatives

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

Monitoring and reporting

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

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

Fiordland Wapiti HOSI draft herd management plan

Achievability of HOSI management, based on proposal

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

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

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

Reflection of conservation objectives

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

“Adoption of the Fiordland Wapiti Herd of Special Interest management approach is intended to encourage collective and concerted action for Fiordland wapiti management and the conservation of indigenous flora and fauna in the Wapiti Area. It seeks to do this by recognising and providing for a range of values, conservation outcomes, communities and recreational activities, and by building on recent collaborative efforts between the Fiordland Wapiti Foundation and the Department to improve Fiordland wapiti management. This, in turn, is expected to expand the number of people contributing to conservation efforts more broadly. Working with hunters and other interested parties to increase understanding of the impacts Fiordland wapiti and other introduced species have on indigenous species can contribute to hunters adopting a conservation mindset when hunting.” (p9)

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

Wapiti draft HOSI

3 Objectives and strategies

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

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

Responsibility

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

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

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

Potential impact of the proposed plan on the Authority’s role

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

Position of the Authority

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

Sika HOSI draft herd management plan

Achievability of HOSI management, based on proposal

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

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

Reflection of conservation objectives

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

“Adoption of the Sika Herd of Special Interest management approach is intended to encourage collective and concerted action for sika management and the conservation of indigenous flora and fauna in Kaimanawa Forest Park, Kaweka Forest Park and Kaweka Forest Conservation Area generally. It seeks to do this by recognising and providing for a range of values, conservation outcomes, communities and recreational activities, and by building on recent collaborative efforts between the Sika Foundation, the Department and others to improve sika management. This, in turn, is expected to expand the number of people contributing to conservation efforts more broadly” (p11).

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

Sika draft HOSI

3 Objectives and strategies

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

Position of the Authority

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

Overall comment

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

Cam McKay

Submission Details

Eirwen Harris Mitchell

From: Cam McKay [s9(2)(a)]
Sent: Monday, 8 December 2025 4:24 pm
To: wapitiHOSIHMP
Subject: Wapiti HOSI Submission
Attachments: WapitiHOSISubmission.pdf

Categories: Green category

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

Hi there, please find the attached submission.

Thanks and Regards

Cam

Cam McKay
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www.pointssouth.co.nz



SUBMISSION: FIORDLAND WAPITI HERD OF SPECIAL INTEREST (HOSI)

Name: Cam McKay

Email: s9(2)(a)

Contact Number: s9(2)(a)

1. Position Statement

I support the Fiordland Wapiti Herd of Special Interest (HOSI) application and support the Herd Management Plan in principle. Amendments are needed to make the plan functional, achievable, and aligned with the values of the Wapiti herd, Fiordland communities, conservation outcomes, and recreational hunters.

2. Why the Fiordland Wapiti herd matters to me

The Fiordland Wapiti herd is one of New Zealand's most iconic wildlife assets and plays a major role in my outdoor life, wellbeing, and my business, Pointssouth. Beyond heritage and adventure, the Wapiti herd demonstrates how hunter-led management can materially improve conservation outcomes, whilst in tandem improving recreational hunting opportunities and all the mental and physical wellbeing benefits that come from that.

The yearly influx of people during the ballot period also provides a significant and important economic boost for the Te Anau community.

The Fiordland Wapiti Foundation has shown that:

- Adaptive management has improved conservation outcomes in the Wapiti area
- Integrated hunting plus professional management produces far better conservation outcomes than unmanaged populations subject to WARO.
- Community engagement strengthens conservation stewardship
- A low density high quality deer herd reduces browsing pressure on sensitive flora
- Hunter funded trap networks have greatly improved the abundance of a number of our native birds.

Through PointsSouth, I see firsthand the conservation and community benefits that flow from a healthy Wapiti herd. A properly implemented HOSI becomes both a hunting framework and a conservation delivery mechanism.

3. Social & Community Outcomes

The HMP should enable hunter and community-led management, strengthening social, cultural, conservation, and economic outcomes. Recreational hunting should remain central to the management of any HOSI.

4. Funding Structure

All funding must go directly to the Fiordland Wapiti Foundation, not through DOC or GAC.

5. Financial Reporting

Financial reporting should not sit within the HMP.

6. Operational Plan

Must remain separate from the HMP and should be flexible, adaptive, and innovative, allowing the Foundation to continue leading deer management evolution.

7. Vegetation & Ecological Monitoring

Monitoring must measure actual deer impacts, be efficient, and inform adaptive management. Remove pellet counts as these do not truly reflect ungulate impacts.

8. Roles & Responsibilities

On the ground work should be delegated to the Fiordland Wapiti Foundation, as these guys have proven their ability over the last 20 years. With any necessary oversight from the GAC rather than Doc.

9. Management, Not Control

Replace all references to “control” with “management.”, as this more accurately reflects this hunter led management.

10. Summary

The Fiordland Wapiti herd delivers enormous cultural, social, economic, and conservation value. The HOSI framework should empower the people and organisations best positioned to deliver these outcomes.

Thanks and Regards

Cam McKay

Anne McMillan

Submission Details

Eirwen Harris Mitchell

From: Anne McMillan [s9(2)(a)]
Sent: Sunday, 7 December 2025 9:16 pm
To: wapitiHOSIHMP; SikaHerdOfSpecialInterest@doc.govt.nz
Subject: Submission Herds of special interest

Categories: Green category

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

Anne McMillan

[s9(2)(a)]

[s9(2)(a)]

[s9(2)(a)]

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

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

I am totally against giving deer any type of legal protection on our conservation land. This reduces biodiversity on conservation land and changes landscaped as only unpalatable species for deer survive. The gut has a goal of increasing biodiversity but this plan completely undermines that - it should not go ahead.

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. 🌱

Anne mcmillan

Keith McRobie - Southland Conservation Board

Submission Details

SOUTHLAND CONSERVATION BOARD

TE ROOPU ATAWHAI O MURIHIKU

Submission Opposing the Designation of a Fiordland Wapiti Herd of Special Interest (HOSI)

To: Department of Conservation – Fiordland Wapiti HOSI Draft Herd Management Plan Consultation

From: Southland Conservation Board (SCB)

Date: 5 December 2025

Contact: Eleanor Kettink s9(2)(a)

Email: s9(2)(a)

Introduction

The Southland Conservation Board (SCB) welcomes the opportunity to submit on the *Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan* (HMP) and the proposal to establish a Herd of Special Interest (HOSI) in a large area of Fiordland National Park.

The SCB **opposes** the proposed HOSI.

Our position is based on:

- the statutory purpose of national parks,
 - the ecological impacts of large introduced ungulates,
 - Ngāi Tahu's expressed opposition,
 - the emerging understanding of Fiordland's natural carbon processes, and
 - Fiordland's central place within **Te Waipounamu – South West New Zealand**, a UNESCO World Heritage Site of global importance.
-

1. Incompatibility With Conservation and National Parks Legislation

The National Parks Act 1980 mandates the **preservation of indigenous ecosystems** and requires that introduced species be **exterminated as far as possible**.

A HOSI would reverse these principles by formally protecting and managing an introduced ungulate within a national park.

The Government has already acknowledged the inconsistency between the HOSI framework and the National Parks Act. Proceeding regardless would undermine the integrity of the legislation intended to safeguard New Zealand's most important natural landscapes.

2. Te Wāhipounamu World Heritage Obligations

Fiordland National Park forms a core part of **Te Wāhipounamu – South West New Zealand**, recognised by UNESCO as one of the world’s finest modern representations of Gondwanan flora and fauna.

Te Wāhipounamu is listed under four natural criteria (vii, viii, ix, x) for:

- outstanding natural beauty,
- exceptional geological processes,
- intact ecological systems, and
- globally significant biodiversity.

UNESCO recognises the region as **the largest and least modified area of New Zealand’s natural ecosystems**, containing extensive rainforests, alpine environments, and habitats critical to rare species such as takahē, kiwi, kākā, and Fiordland crested penguin.

Introduced ungulates—including wapiti—are specifically identified as **major threats** to the ecological integrity of Te Wāhipounamu. Browsing by large deer species damages forest regeneration, reduces biodiversity, alters natural ecological processes, and threatens the values for which the area was inscribed.

Designating a HOSI in the heart of a World Heritage Site would be in direct tension with New Zealand’s obligations to protect these outstanding universal values for future generations.

3. Reduction of Conservation Responsibilities and Public Accountability

A HOSI would shift key elements of ungulate management away from DOC and statutory conservation bodies to non-statutory interest groups. This shift is occurring in a context where deer management on conservation land has already been weakened by funding constraints.

Such a structural change risks:

- sidelining statutory conservation priorities,
 - reducing transparency, and
 - embedding management models that prioritise hunting interests over ecological protection.
-

4. Funding Pressures Should Not Drive Legislative or Policy Change

While the Southland Conservation Board acknowledges the significant work undertaken by the Fiordland Wapiti Foundation, DOC’s historic underfunding cannot justify altering the conservation purpose of national parks. Recent surges in deer numbers elsewhere in the country demonstrate the ecological cost of reducing control efforts. Strengthening DOC’s capacity, not redesigning legislation to accommodate ungulates, is the appropriate solution.

5. Emerging Carbon Research Reinforces the Need for Stronger Protection

New research led by NIWA (2011–2020) suggests that **the southwest South Island—especially Fiordland—may be absorbing more carbon than previously estimated**. While the exact mechanisms are still being examined, mature native forests appear to be important contributors.

Healthy, intact, regenerating forests are essential to this natural carbon uptake. By contrast, sustained browsing by large deer suppresses regeneration and undermines forest structure and function.

Although further study is required, the potential for Fiordland’s forests to act as an important natural carbon sink reinforces the need to **reduce** ungulate pressure—not formalise and protect it.

6. A Systematic Review Is Needed, Not a Species-Specific Workaround

The HOSI proposal attempts to retrofit legislation relating to introduced species without addressing wider biodiversity, climate, and Treaty responsibilities. A piecemeal approach targeting one species in one national park risks inconsistency and sets an undesirable precedent.

A cohesive review of the National Parks Act, Conservation Act, and Game Animal Council Act is needed before any significant change to ungulate management can be considered.

7. Precedent for Other National Parks

If established, a Fiordland HOSI will inevitably be cited as justification for similar proposals in other national parks, including those already suffering intense browsing pressure. This would further erode the principle that national parks exist primarily to protect natural, indigenous ecosystems.

8. Treaty Partnership and Ngāi Tahu Opposition

All of Fiordland lies within the Ngāi Tahu takiwā. Ngāi Tahu have clearly indicated that a Fiordland HOSI conflicts with their cultural values, environmental responsibilities, and relationship with Te Rua-o-Te-Moko.

Proceeding contrary to their expressed position would be inconsistent with Treaty partnership obligations and undermine their role as kaitiaki.

9. Ecological Impacts of Maintaining a Wapiti Herd

Wapiti are large, high-impact browsers. Their presence reduces understory diversity, prevents the regeneration of palatable species, alters forest composition, and contributes to the degradation of alpine ecosystems. These impacts are well-documented and directly threaten the values of both Fiordland National Park and the Te Wāhipounamu World Heritage Site.

Establishing a HOSI would risk embedding long-term ecological damage in one of the world’s most significant natural refuges.

Recommendations

The Southland Conservation Board recommends that the Minister and DOC:

1. **Do not designate a Fiordland Wapiti Herd of Special Interest.**
 2. **Uphold the National Parks Act 1980 and the World Heritage obligations associated with Te Wāhipounamu.**
 3. **Ensure Ngāi Tahu’s views are central** in all decisions relating to Fiordland National Park.
 4. **Increase funding for DOC’s ungulate control**, particularly within Fiordland.
 5. Consider any testing of the HOSI model **only outside national parks**.
 6. Align conservation management with emerging ecological and climate science.
-

Conclusion

Fiordland National Park is a globally significant landscape at the heart of Te Wāhipounamu – South West New Zealand. The proposed HOSI would elevate an introduced game species over the ecological, cultural, and World Heritage values this region is entrusted to protect.

This proposal is incompatible with the principles of the National Parks Act, the values of Ngāi Tahu, the requirements of UNESCO World Heritage status, and New Zealand’s long-term conservation responsibilities.

Fiordland must remain a sanctuary for indigenous biodiversity—not a protected haven for introduced ungulates.

Nō reira, tēnā koutou, tēnā koutou, tēnā tātou katoa.

Below is a **DOC-template-aligned version** of your submission.

This version follows the typical structure used in DOC’s online consultation forms:

- **Your details**
- **General position (support/oppose)**
- **Comments on proposal** (broken into labelled, concise sections)
- **Additional comments**
- **Wish to be heard**

If you’d like it further shortened to fit the 800–1200 character boxes that sometimes appear in the form, I can produce a compressed version.

Submission: Fiordland Wapiti Herd of Special Interest (HOSI) – Draft Herd Management Plan

1. Your Details

Name / Organisation: Southland Conservation Board (SCB)

Contact person: Eleanor Kettink – Board Support Officer

Email: southlandconservationboard@doc.govt.nz

Role: Statutory conservation board appointed under the Conservation Act 1987

2. Do you support or oppose the proposed Fiordland Wapiti HOSI?

Oppose

3. Reasons for your views

3.1 Inconsistency with National Parks Act 1980

The National Parks Act requires introduced animals to be **exterminated as far as possible** and prioritises the preservation of indigenous ecosystems. Creating a legally recognised herd of an introduced ungulate inside a national park directly conflicts with these statutory purposes. The Government has acknowledged this inconsistency; proceeding regardless threatens the integrity of national park protections.

3.2 Te Wāhipounamu World Heritage Obligations

Fiordland National Park sits at the heart of **Te Wāhipounamu – South West New Zealand**, a UNESCO World Heritage Site recognised for its outstanding natural beauty, unique geological processes, intact Gondwanan ecosystems, and globally significant biodiversity.

Introduced ungulates—especially large deer—are expressly identified as threats to these values.

Maintaining or protecting a wapiti herd would undermine New Zealand’s international obligations to safeguard the Outstanding Universal Values of the site.

3.3 Ecological impacts of wapiti

Wapiti are large, high-impact browsers. Their presence:

- suppresses forest regeneration,
- alters understory composition,
- degrades alpine ecosystems, and
- threatens rare species habitats.

Formalising their protection via a HOSI would embed long-term ecological damage in one of New Zealand’s most pristine natural areas.

3.4 Treaty partnership and Ngāi Tahu views

Fiordland lies entirely within the Ngāi Tahu takiwā. Ngāi Tahu have clearly stated they **do not support** a Fiordland HOSI. Proceeding despite this is inconsistent with the Crown's Treaty obligations and undermines Ngāi Tahu's role as kaitiaki of Te Rua-o-Te-Moko and Te Wāhipounamu.

3.5 Conservation accountability and governance concerns

A HOSI would shift control and influence from statutory agencies to a non-statutory interest group. This risks:

- weakening ecological priorities,
 - reducing transparency, and
 - embedding a hunting-led management model in a national park.
DOC's historic underfunding should not drive changes that reduce conservation oversight.
-

3.6 Emerging carbon research (with reduced emphasis)

Recent NIWA research (2011–2020) indicates the southwest South Island may absorb more carbon than previously recognised. Intact, regenerating native forests appear to contribute to this natural carbon uptake.

Regardless of the exact mechanisms, heavier browsing pressure from large ungulates will **reduce** forest health and regeneration. This reinforces the need to minimise—not institutionalise—introduced deer in Fiordland.

3.7 Precedent for other national parks

Establishing a HOSI in Fiordland would set a precedent for similar proposals elsewhere, weakening long-standing protections that keep national parks focused on restoring and preserving indigenous biodiversity.

3.8 Need for system-wide legislative review, not a species-specific workaround

The proposal attempts to retrofit the HOSI model into national parks without addressing broader statutory inconsistencies. A holistic review of the National Parks Act, Conservation Act, and Game Animal Council Act is required before any major shift in ungulate management can be considered.

4. What changes would you like to see?

SCB recommends:

1. **Do not designate** a Fiordland Wapiti Herd of Special Interest.
2. Uphold the National Parks Act and protect the World Heritage values of Te Wāhipounamu.
3. Ensure full partnership with Ngāi Tahu in decision-making.

4. Increase DOC funding for ungulate control within Fiordland.
 5. Consider any testing or trialling of the HOSI model **only outside** national parks.
 6. Align deer management with biodiversity, climate, and Treaty responsibilities.
-

5. Any other comments

Fiordland National Park is one of the world's most intact natural landscapes. The proposed HOSI would elevate an introduced game species above the ecological, cultural, and international obligations that define this region. This is incompatible with New Zealand's conservation responsibilities and the purpose of national parks.

6. Would you like to speak to your submission?

No

Nga mihi



Keith McRobie
(Chair Southland Conservation Board)

Mandy Mee

Submission Details

Eirwen Harris Mitchell

From: Mandy Mee s9(2)(a)
Sent: Monday, 8 December 2025 7:02 am
To: wapitiHOSIHMP; SikaHerdOfSpecialInterest@doc.govt.nz
Subject: Submission re Deer

Categories: Green category

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

Mandy Mee

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.

I appreciate your consideration of the above.

Thank you
Mandy

Mandy Mee

s9(2)(a)

Andrew Mentor

Submission Details

Eirwen Harris Mitchell

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

Categories: Green category

Hi Eirwen

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

Ngā mihi,
David

David Owen

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



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

Minister James Meager.

Kia ora James

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

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

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

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

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

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

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

Yours sincerely

Andrew Mentor

s9(2)(a)

Kiwi Handler, pest controller and voter.

s9(2)(a)

Nathan Mirfin

Submission Details

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

Submitter: Nathan Mirfin

Contact:

s9(2)(a) /

s9(2)(a)

Date: 6 December 2025

EXECUTIVE SUMMARY

I write in **strong support** of the proposed designation of the Fiordland Wapiti Herd as a Herd of Special Interest and the associated Draft Herd Management Plan. As a hunter with both local New Zealand experience and professional hunting experience overseas, I have witnessed firsthand how effective wildlife management can create sustainable hunting resources while simultaneously benefiting conservation outcomes.

The wapiti and sika deer populations, which have been part of New Zealand's landscape for over a century, represent a pivotal opportunity for New Zealand to adopt a progressive, balanced approach to wildlife management that recognises these species as valuable resources worthy of active stewardship rather than simply pests to be eradicated.

INTRODUCTION

My Background and Perspective

I have hunted extensively throughout New Zealand and have worked professionally as a hunter overseas, where I have observed successful game management systems that balance conservation, recreation, and sustainable use. These international experiences have shown me that well-managed hunting programs can deliver multiple benefits: healthy ecosystems, thriving wildlife populations, engaged communities, and significant conservation funding.

Why This Matters

Wapiti and sika deer have been present in New Zealand for over a century-wapiti since 1905 when they were gifted by President Theodore Roosevelt. Over more than 120 years, these animals have become deeply integrated into our culture and landscape. They provide:

- **Mental health benefits** through outdoor recreation and connection to nature

- **Family and community bonding** through shared hunting experiences

- **Food security** for families who depend on wild game to supplement their diets
- **Access to remote areas** that would otherwise remain unutilised
- **Cultural identity** as these species are now ingrained in the New Zealand hunting tradition

These animals have established themselves as a natural part of our ecosystem, much as humans have adapted to and become part of New Zealand's environment.

SUPPORT FOR THE HERD OF SPECIAL INTEREST DESIGNATION

I strongly support this historic designation for the following reasons:

1. Recognition of Cultural Integration

The Draft Plan appropriately recognises that Fiordland wapiti have become "a New Zealand hunting icon" with "historic significance to many New Zealanders." This is not merely about trophy hunting-it represents a connection to our outdoor heritage and the Roosevelt gift of 1905 that has shaped over a century of New Zealand hunting culture.

2. Balanced Approach to Conservation

The Plan's Objective 1 correctly prioritises maintaining natural biodiversity while recognising that managed hunting can be the primary tool to achieve this. This aligns with international best practice I have observed overseas, where hunting licenses fund conservation and hunters act as active land stewards rather than passive consumers.

3. Sustainable Management Model

The self-funding approach outlined in Objective 3 and Strategy 1.7-1.8 is crucial. By generating revenue through hunting fees and partnerships, this program can fund its own management and contribute additional resources to wider conservation efforts in Fiordland National Park. This model has proven successful internationally and represents a mature, responsible approach to wildlife management.

COMMENTS ON SPECIFIC OBJECTIVES

OBJECTIVE 1: Conservation and Biodiversity

Strongly Support

The Plan's primary focus on maintaining natural biodiversity is appropriate and demonstrates that hunting-based management can deliver conservation outcomes. I support:

- Targeted population management to allow regeneration of browsed indigenous flora

- Selective removal of animals to protect sensitive areas
- Recognition that intensive management can achieve conservation goals while maintaining hunting opportunities

Recommendation: Ensure monitoring data (Strategy 2.1) is made publicly available to demonstrate conservation outcomes and maintain accountability to all stakeholders.

OBJECTIVE 2: Enhanced Hunting Experience

Strongly Support

The goal of producing high-quality bulls annually enhances both the recreational value and the genetic management of the herd. The selective approach encourages hunters to:

- Target animals with fewer wapiti-like traits (Strategy 1.2b)
- Maintain optimal sex ratios
- Support long-term herd health

This approach transforms hunters from extractors to active participants in wildlife management.

OBJECTIVE 3: Self-Funding and Revenue Generation

Strongly Support with Emphasis

This is perhaps the most critical objective. The self-funding model ensures:

- Long-term sustainability without dependence on government appropriations
- Accountability to the hunting community who fund the program
- Additional conservation funding for wider Fiordland initiatives

International Perspective: Overseas, I have seen similar fee-based systems generate substantial conservation funding. Hunter-funded programs often outperform government-only initiatives because hunters have direct investment in outcomes.

Recommendation: Clearly communicate fee structures and how funds are allocated. Transparency will build trust and support from the hunting community.

OBJECTIVE 4: Community Engagement

Strongly Support

Engaging the hunting community in active management creates stewardship values and extends conservation efforts beyond what government agencies could achieve alone. The Fiordland Wapiti Foundation's work demonstrates this model already succeeds-removing 900-1,100 deer annually, operating 500+ predator traps, and maintaining historic huts.

Personal Experience: The mental health benefits of hunting and outdoor recreation cannot be overstated. Access to wild places and the challenge of ethical hunting provide therapeutic value for thousands of New Zealanders. These activities strengthen families and communities through shared experiences and traditions.

OBJECTIVE 5: Treaty Partnership

Support

Strengthening relationships with Papatipu Riinanga and recognising Ngai Tahu interests is essential. The inclusion of matauranga Maori in management decisions (Strategy 2.5) and opportunities for Papatipu Riinanga participation demonstrates respect for Treaty obligations.

OBJECTIVES 6-9: Monitoring, Research, and Reporting

Strongly Support

These objectives provide the scientific foundation for adaptive management. Regular monitoring, research, and public reporting ensure accountability and allow management approaches to evolve based on evidence.

COMMENTS ON SPECIFIC STRATEGIES

STRATEGY 1: Management Tools

Strong Support for Balanced Approach

The combination of recreational hunting, commercial recovery, and professional control operations (Strategy 1.9) provides flexibility to achieve conservation and recreational objectives. Key points:

- **Ballot System (1.5):** The current ballot system is oversubscribed, demonstrating strong demand. Maintaining this system during the bugle period protects the quality hunting experience.
- **Year-Round Hunting (1.6):** Allowing hunting outside the bugle period focused on less desirable animals (fewer wapiti traits, cows) is excellent strategy for genetic management and population control.
- **Fee Structure (1.7-1.8):** Charging appropriate fees is essential for self-funding. However, fees must remain accessible to average New Zealanders, not just wealthy hunters. A tiered fee structure could balance revenue needs with accessibility.

STRATEGY 2: Monitoring and Research

Critical for Success

The monitoring programme (Strategy 2.1) must be robust and credible. I support:

- Ecological monitoring both above and below bushline
- Hunter harvest monitoring including age structure and jaw measurements

- Hunter satisfaction surveys

Recommendation: Consider incorporating hunter observations and field data. Experienced hunters spend more time in the Wapiti Area than any other group and can provide valuable qualitative information on herd health, behaviour patterns, and environmental conditions.

STRATEGY 3: Partnerships and Stewardship

This is Transformative

Strategy 3.4's educational component is crucial. Many New Zealanders do not understand that:

- Managed hunting can improve conservation outcomes
- Selective harvest improves herd genetics and health
- Hunters contribute significantly to conservation through fees, volunteer work, and advocacy

International Comparison: Overseas, I have seen how education transforms public perception of hunting from "killing animals" to "wildlife management." Countries with mature hunting cultures recognise hunters as conservationists. New Zealand has an opportunity to develop this understanding.

The opportunities for hunters to contribute to wider conservation (Strategy 3.10) including predator control and facility maintenance, leverage the hunting community's skills and commitment for broader environmental benefit.

STRATEGY 4: Annual Planning and Reporting

Essential for Accountability

Annual operational plans and public reporting (Strategy 4.1-4.5) ensure transparency and allow continuous improvement. Financial reporting (Strategy 4.3) is particularly important to demonstrate responsible use of hunter-generated funds.

THE CASE FOR ACTIVE WILDLIFE MANAGEMENT

These Animals Are Now Part of Our Ecosystem

Wapiti have been in New Zealand for 120 years-since 1905. Sika deer have similarly been established for over a century. They have established ecological relationships with native flora and fauna across multiple generations. While they do impact indigenous vegetation, the practical reality is:

- Complete eradication is neither feasible nor economically realistic
- Managed populations can exist at levels that allow indigenous regeneration
- Active management through hunting provides the best balance

Just as humans have become part of New Zealand's environment over centuries-for better and worse-these deer species have been part of our ecological reality for over 100 years. The question is not whether they exist, but how we manage them responsibly.

Hunting as a Management Tool

From my overseas experience, I have learned that hunting is one of the most cost-effective and socially beneficial wildlife management tools when properly structured. The benefits include:

Economic:

- Self-funding through user fees
- Tourism revenue from international hunters
- Local economic activity in regional communities
- Commercial recovery operations providing employment

Conservation:

- Targeted population control
- Protection of sensitive habitats
- Funding for broader conservation initiatives
- Active monitoring and reporting by invested stakeholders

Social:

- Mental health benefits from outdoor recreation
- Family and community traditions
- Connection to wild places and natural heritage
- Food security for families

Cultural:

- Continuation of New Zealand's hunting heritage
- Recognition of the Roosevelt gift and its century-long legacy
- Development of ethical hunting values and land stewardship

Learning from International Examples

Countries like the United States, Canada, and several European nations have demonstrated that well-managed game species can deliver remarkable outcomes:

- **United States:** The Pittman-Robertson Act (1937) taxes hunting equipment to fund wildlife conservation. This hunter-funded model has restored numerous species from near-extinction and maintains millions of hectares of habitat.
- **Europe:** Managed red deer, roe deer, and wild boar populations provide sustainable hunting while maintaining biodiversity. Hunters often manage the land and are legally responsible for population control.

These systems work because they recognise wildlife as a renewable resource that, when properly managed, benefits everyone-hunters and non-hunters alike.

New Zealand has an opportunity to adopt similar principles while respecting our unique conservation values and Treaty obligations.

RECOMMENDATIONS FOR STRENGTHENING THE PLAN

While I support the Draft Plan overall, I offer the following recommendations:

1. Accessibility and Equity

Ensure fee structures do not exclude ordinary New Zealanders. Consider:

- Tiered pricing based on residency (NZ residents vs. international)
- Youth/junior hunter rates to encourage next generation
- Family packages
- Hardship provisions

2. Enhanced Public Education

Expand Strategy 3.4 with:

- School programs about wildlife management and conservation
- Public open days in Te Anau and regional centres
- Social media and documentary content showing conservation outcomes
- Partnership with universities for research opportunities

3. Hunter Contribution Recognition

Formally recognise hunter contributions through:

- Annual awards for conservation volunteers
- Public acknowledgment of Fiordland Wapiti Foundation achievements

- Certification programs for hunters who complete conservation training

4. Data Transparency

Make all monitoring data publicly accessible through:

- Annual reports posted online
- Interactive maps showing population trends
- Comparison data with adjacent areas showing conservation benefits

5. Adaptive Management Triggers

Define clear thresholds that would trigger management changes, such as:

- Maximum population densities in sensitive areas
- Minimum indigenous species regeneration rates
- Minimum hunter satisfaction scores

6. Extension to Sika Deer

The submitter's reference to "sika deer" suggests interest in similar designation for other species. I recommend:

- Monitoring this program's success as a model for future Herds of Special Interest
- Considering sika deer populations for similar designation if appropriate
- Developing a framework for additional species based on lessons learned

ADDRESSING POTENTIAL CONCERNS

"Introduced Species Should Be Eradicated"

Response: While I respect this viewpoint, the practical reality is:

- Complete eradication of wapiti from Fiordland is extremely costly and likely impossible given the terrain
- Managed populations can coexist with conservation objectives
- The cultural and recreational values these animals provide are now significant
- Active management through hunting achieves better conservation outcomes than underfunded, sporadic control efforts

"Hunting Conflicts with Conservation"

Response: International evidence and the Fiordland Wapiti Foundation's track record demonstrate otherwise:

- Managed hunting provides funding conservation agencies lack
- Hunters actively contribute to predator control, monitoring, and facility maintenance
- Selective harvest improves herd health and reduces overall population pressure
- The alternative-unmanaged populations or expensive aerial control-delivers worse outcomes

"This Benefits Only Hunters"

Response: The benefits extend far beyond the hunting community:

- Indigenous flora regeneration benefits all New Zealanders and protected species
- Economic activity supports regional communities
- Outdoor recreation access benefits trampers, photographers, and other users
- Conservation funding from hunting fees supports broader park management
- The precedent creates a model for sustainable wildlife management nationwide

CONCLUSION

The Fiordland Wapiti Herd of Special Interest designation represents a mature, evidence-based approach to wildlife management that balances conservation, recreation, cultural values, and economic sustainability. It acknowledges over a century of integration into New Zealand's natural and cultural heritage.

As someone who has hunted both locally and professionally overseas, I can state with confidence that this Plan incorporates international best practices while respecting New Zealand's unique conservation context and Treaty obligations.

This is not about prioritising hunting over conservation-it is about using hunting as a tool to achieve conservation outcomes while recognising the cultural, social, and economic values these animals provide.

The wapiti and sika deer populations have been part of New Zealand's natural heritage for over a century. The question before us is whether we manage them responsibly and sustainably, or whether we continue treating them solely as pests in an unwinnable eradication campaign.

I urge the Minister for Hunting and Fishing to:

- 1. Approve the Fiordland Wapiti Herd of Special Interest designation**
- 2. Adopt this Draft Herd Management Plan with the recommendations outlined above**
- 3. Use this as a model for future Herd of Special Interest designations, including sika deer**
- 4. Champion the role of hunters as conservation partners and land stewards**

This is a pivotal moment for wildlife management in New Zealand. Done right, this program will demonstrate that conservation and sustainable hunting are complementary, not contradictory. It will engage thousands of New Zealanders in active environmental stewardship, generate conservation funding, and protect the wild places and wildlife we all treasure.

It is time to embrace a balanced, sustainable approach to these animals as the valuable resource they have become.

I support this Plan and look forward to its implementation.

Signature: 

Name: Nathan Mirfin

Date: 6 December 2025

SUBMISSION DETAILS

This submission may be made public as part of the consultation process. I am happy to be contacted for further discussion if required.

Contact Information:

- Email: 
- Phone: 

Matthew Morley

Submission Details

Eirwen Harris Mitchell

From: Mathew Morley s9(2)(a)
Sent: Sunday, 7 December 2025 8:43 pm
To: wapitiHOSIHMP
Subject: MATHEW MORLEY SUBMISSION
Attachments: HOSI SUBMISSION.docx

Categories: Green category

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

Please find my submission attached

To whom it may concern.

Submission from

Mathew Morley

s9(2)(a)

I support the Herd Management Plan in principle but believe amendments are needed for it to work well for the Fiordland Wapiti herd and the biodiversity of this amazing place

As one of many avid hunters I believe we are right at the top of the list when it comes to contributing to the conservation of our very diverse native wonderlands. We are passionate and understand the environment intimately.

I was lucky enough to grow up with good ethics around hunting and respect that the animals are an asset to this country but also need management. In this case Fiordland Wapiti Foundation.

The herd management Plan under HOSI needs to reflect the values of the Fiordland Wapiti herd!!

I value the heard for the meat they provide my family and many other families an amazing protein source.

The trophy opportunity that is unique to this country. Yet to be ticked off by me but been part of 2 friends opportunities taken.

The place they live, I would never experience what I have and shared that with friends and family if they were not a part of Fiordland.

I cannot wait to pull a 3rd ballot draw so I can go back and one day with my daughter so she can to experience this magical place and the herd that has resided there for so long.

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

From what I have read and understand the 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. We have seen what this type of interference looks like and poor planning and decision making when given to the incorrect lines.

Keep financial reporting simple, 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.

Vegetation monitoring

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. This has been used in the past and is not a true gauge on numbers which I know from first hand hunting deer across New Zealand and their habits.

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.

LETS GET THIS RIGHT FOR A BETTER BRIGHTER FUTURE OF NEW ZEALAND

Andrew Morrison - Hunters for Conservation Trust

Submission Details

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

--BOTH WAPITI and SIKA HERDS

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

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

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

HFC RESPECTFULLY SUBMITS : --

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

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

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

Richard Burdon, Chairman

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

HUNTERS FOR CONSERVATION TRUST

www.huntersforconservation.co.nz

c/o [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Director

DEPARTMENT of CONSERVATION

P.O.BOX 4715

CHRISTCHURCH 8140

wapitihosihmp@doc.govt.nz

sikahosihmp@doc.govt.nz

Dear Sir ,

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

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

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

Yours sincerely,

FOR AND ON BEHALF OF HUNTERS FOR CONSERVATION TRUST

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Item of business :

Game Animal Council (Herds of Special Interest) Amendment Bill

Submission name :

HUNTERS FOR CONSERVATION TRUST

Comments

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

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

IT IS IMPORTANT THAT-

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

THE HFC SUPPORTS THE BILL because--

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

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

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

*The herd lives in a sound healthy managed habitat

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

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

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

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

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

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

Recommendations

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

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

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

Kezia Mowat

Submission Details

Eirwen Harris Mitchell

From: Kezia Mowat [s9(2)(a)]
Sent: Monday, 8 December 2025 8:32 am
To: wapitiHOSIHMP; SikaHerdOfSpecialInterest@doc.govt.nz
Subject: Submission on the Draft Sika Herd of Special Interest (HOSI) Management Plan.

Categories: Green category

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Good morning,

My name is Kezia Mowat and I am making a submission on the Draft Wapoti 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.

Thank you for your time,
Kezia Mowat.

James Pearse

Submission Details

Eirwen Harris Mitchell

From: James Pearse [redacted]
Sent: Monday, 8 December 2025 9:26 am
To: wapitiHOSIHMP
Subject: Wapiti management plan submission

Categories: Green category

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

Hi there,

I wish to make a submission on the Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan.

I support the Herd Management Plan in principle, but believe some amendments are needed to ensure that it works well for the Fiordland Wapiti Herd.

The Herd Management Plan needs to reflect the values of the Fiordland Wapiti Herd. Fiordland is a very special spot, and hunting provides an incredible opportunity to enjoy it. The Wapiti are a very special herd of deer, there is a rich history of hunting, and great heritage. The genetics are still there, and good trophies do come out. It is worth preserving this great resource. The hunting experience provided down there is the best in New Zealand. Remoteness, low population of high quality animals, well managed ballot system ensuring not too many hunters around, are all positives of the work that has been done to date.

The Herd Management Plan should support community and hunter led management and positive social and economic outcomes.

The Fiordland Wapiti Foundation has a great track record for proactive management in the area and should be the group given the role to implement the Herd Management Plan.

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 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.

Overall I support the Draft Management Plan. It is a great initiative.

Regards

James Pearse

3. Social and community outcomes

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

4. Funding

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.

5. Keep financial reporting simple

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

6. Operational 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.

7. Vegetation monitoring

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.*

8. Roles and responsibilities

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.

9. Setting the correct tone for HOSI

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

Deadline 8 December 2025

Marcus Pinney

Submission Details

Eirwen Harris Mitchell

From: Marcus Pinney s9(2)(a)
Sent: Monday, 8 December 2025 10:29 am
To: wapitiHOSIHMP
Subject: SCI NZ Submission on Draft Herd Management Plan
Attachments: WAPITI HERD MANAGEMENT PLAN SUBMISSION.docx

Categories: Green category

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Dear Sir / Madam,

Attached is the SCI NZ Submission on the draft herd management plan.

If you wish to discuss any part of this submission, please do not hesitate to contact me.

Regards

Marcus Pinney

President
SCI New Zealand Chapter



WAPITI HERD MANAGEMENT PLAN SUBMISSION

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

SCI NZ fully supports gazetting a Fiordland Wapiti HOSI

SCI NZ supports the Herd Management Plan with a few amendments

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

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

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

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

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

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

Hunting and recreation values

The Wapiti herd is of huge importance to the hunting community, it would be so great to see the NZ Game Animal Council and the Fiordland Wapiti Foundation get this herd management plan implemented and show what genuine Game Animal Management looks like and the positive outcomes for the community and the environment.

Objectives and Strategies

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

- Provide for high quality hunting experience;
- Wapiti are healthy, Encourage the removal of female animals at correct time of year, to avoid animal welfare issues.eg not shooting hinds / cows over fawning- November / December and January
- Trophy potential is maximised, investigate options to improve the wapiti herd, what options can be legally done inside the HOSI Framework.
- Access for hunting is enhanced.
- Hunter and community involvement in management of the herd is prioritised;
- Adaptive management – (Not like the 1993 HTCP) was supposed to be adaptive and reviewed... but never was. Why create a plan if its not going to be fully or correctly implemented?

Management

All references to control should be replaced with Management.

All the Management details and decisions should be determined by the NZ Game Animal Council with input and the Fiordland Wapiti Foundation.

Undertake Monitoring and Research to support management and decision making

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

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

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

Regards

Marcus Pinney

President of SCI NZ Chapter

Mary Ralston

Submission Details

Eirwen Harris Mitchell

From: Mary Ralston s9(2)(a)
Sent: Friday, 5 December 2025 10:30 am
To: wapitiHOSIHMP
Subject: Wapiti HOSI draft HMP Submissions
Attachments: Wapiti Herds of Special Interest.docx

Categories: Green category

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

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

Mary Ralston

Submission on Wapiti Herds of Special Interest

Mary Ralston

s9(2)(a)

s9(2)(a)

s9(2)(a)

2 December 2025

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

Kieran Reeve

Submission Details

SUBMISSION: FIORDLAND WAPITI HERD OF SPECIAL INTEREST (HOSI)

Name: s9(2)(a)

Email: s9(2)(a)

Contact Number: s9(2)(a)

1. Position Statement

I support the Fiordland Wapiti Herd of Special Interest (HOSI) application and support the Herd Management Plan in principle. Amendments are needed to make the plan align with the values of the Wapiti herd, Fiordland communities, conservation outcomes, and recreational hunters.

2. Why the Fiordland Wapiti herd matters to me

The Fiordland Wapiti herd is one of New Zealand's most iconic wildlife assets and should be celebrated as such. Wapiti play a major role in my personal life, wellbeing, and my business, ridgetop guiding. Beyond heritage and adventure, the Wapiti herd demonstrates how hunter-led management can improve conservation outcomes, whilst in tandem improving recreational hunting opportunities and all the mental and physical wellbeing benefits associated to hunting wapiti.

The Fiordland Wapiti Foundation has shown that:

- Active/adaptive management improves vegetation structure and regeneration
- Integrated hunting plus professional management produces far better conservation outcomes than unmanaged populations subject to WARO.
- Community engagement strengthens conservation stewardship
- Targeted herd improvement reduces browsing pressure on sensitive flora

The wapiti are an integral part of my personal growth and family wellbeing for the following reasons:

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

businesses. This herd directly contributes to the local economy and community wellbeing.

My family are committed conservationists. My partner Belinda Jones and I regularly take our children, friends with their children, and clients including corporates from overseas companies into the backcountry, who all share a passion for the New Zealand environment and the opportunities the Wapiti Herd have to offer.. When empowered through a strong, values-based HMP, hunters and communities help achieve measurable conservation improvements.

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

Therefore it is imperative to my values that there is:

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

3. Social & Community Outcomes

The HMP should enable hunter and community-led management, strengthening social, cultural, conservation, and economic outcomes.

4. Funding Structure

All funding must go directly to the Fiordland Wapiti Foundation, not through DOC or GAC.

5. Financial Reporting

Financial reporting should not sit within the HMP.

6. Operational Plan

Must remain separate from the HMP and should be flexible, adaptive, and innovative, allowing the Foundation to continue leading deer management evolution.

7. Vegetation & Ecological Monitoring

Monitoring must measure actual deer impacts, be efficient, and inform adaptive management. Remove pellet counts as these do not truly reflect ungulate impacts.

8. Roles & Responsibilities

Implementation should be delegated to the Fiordland Wapiti Foundation, Over the past 20 years they have proven excellence in herd management & ecological sustainability.

9. Management, Not Control

Replace all references to “control” with “management.”, as this more accurately reflects this hunter led management.

10. Summary

The Fiordland Wapiti herd delivers enormous cultural, social, economic, and conservation value. The HOSI framework should empower the people and organisations best positioned to deliver these outcomes. I am very thankful for the opportunity to have these submissions heard, as all deer including Wapiti play a vital role in my families development.

Kindest regards

Kieran Reeve

Luke Richards

Submission Details

Eirwen Harris Mitchell

From: Luke Richards s9(2)(a)
Sent: Sunday, 7 December 2025 10:07 pm
To: SikaHerdOfSpecialInterest@doc.govt.nz; wapitiHOSIHMP
Subject: Submission on the Draft Wapoti Herd of Special Interest (HOSI) Management Plan

Categories: Green category

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Luke Richards

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:

- 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,

Luke Richards

s9(2)(a)

Submitter 296

Submission Details

Eirwen Harris Mitchell

From: s9(2)(a)
Sent: Monday, 8 December 2025 4:45 pm
To: wapitiHOSIHMP
Subject: Wapiti HOSI and HMP submission
Attachments: RR Wapiti HMP:HOSI Submission.docx

Categories: Green category

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Hi, Please find attached HOSI and HMP submission.

Kind regards

s9(2)(a)

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Wapiti HMP & HOSI Submission

Details of submitter

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

ALL DETAILS NOT FOR PUBLIC RECORD

I support the Wapiti HOSI

I support the Herd Management Plan with the ammendments recommended below

This herd and hunting matter to me because:

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

I seek for the plan to be amended so that:

- Clearly reflects the value of the herd and hunting set out above throughout the document.
- These herd and hunting values should be incorporated into the Objectives
- Ecological outcomes/ objectives and monitoring should not be unattainable while still having a high value huntable herd, and set the HOSI up to fail.
- The HMP should explain the reasons for and implement an adaptive management framework which will protect and enhance these values while managing impacts the deer may be having on the environment; - deliver better outcomes than the status quo;
- Monitoring must directly relates to the impacts the deer on having on the environment ie browse;
- There is CLEAR AND DIRECT CONNECTION BETWEEN OBJECTIVES AND STRATEGY AND MONITORING. Any possibility of mis match between these 3 or differeing interpretation must be removed as this sets the HMP up to fail.
- Given the plan binds the GAC appropriate funding should be made available for this accountability and management. Again, otherwise the HMP is set up to fail.

Karla Rix-Trott

Submission Details

Eirwen Harris Mitchell

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

Categories: Green category

Hi Eirwen

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

Ngā mihi,
David

David Owen

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



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

Dear Ministers,

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

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

Your faithfully
Karla Rix-Trott

s9(2)(a)

Eugenie Sage

Submission Details

Submission on proposed Fiordland Wapiti HOSI and draft Herd Management Plan

Eugenie Sage s9(2)(a)

s9(2)(a)

8 December 2025

Submission on proposed Wapiti Herd of Special Interest in Fiordland National Park

1. Introduction

1. I strongly oppose the establishment of the Fiordland Wapiti Herd of Special Interest (HOSI) and the draft herd management plan (HMP or plan) and ask that they not proceed.

The focus should be in developing a national deer strategy which prioritises control of all deer species including wapiti and reduces the ecological, cultural and economic damage being caused by the explosion in deer numbers.

2. Relevant experience includes : member of Himalayan Tahr Liason Committee during 2000s; member of Parliament's Environment Committee when it considered the Game Animal Council Act 2013; Minister of Conservation (2017-2020).

Reasons for opposition

3. National parks are treasured places. They are our pre-eminent natural areas established to protect the indigenous plants and wildlife and natural landscapes of Aotearoa. Along with nature reserves, national parks provide the strongest and best legally protected refuges for indigenous species. Many of our indigenous plants and wildlife are endemic and only found in Aotearoa¹ so we have an international responsibility to ensure they thrive. The HOSI and its objectives of improving recreational hunting opportunities, promoting these to international tourists to increase hunters will undermine national park and conservation values and the protection of our distinctive indigenous biodiversity by putting management of invasive browsers and hunting outcomes ahead of nature conservation .

4. The HOSI and the wapiti herd management plan would legitimise the presence of introduced browsers in the park and their ongoing and increasing damage to the indigenous plants and wildlife and habitats which national park status is supposed to protect and preserve.

5. As a Crown agency, the Department manages Fiordland National Park on behalf of all New Zealanders and seeks to implement the principles of the Treaty of Waitangi. Delegating oversight of the HOSI to the Game Animal Council (GAC) and operational implementation to the Fiordland Wapiti Foundation (FWF) would effectively transfer management of 15% of the park from DoC to hunting interests. Based on experience with the Himalayn Thar Control Plan, hunter management will obstruct and delay any biodiversity initiatives to control deer.

Threat to World Heritage Values

6. Fiordland National Park is a significant part of the 2.6 million ha. of Te Wāhipounamu South-West New Zealand World Heritage Area. Through listing South West New Zealand as a World Heritage site, UNESCO has recognised that its ecological, geological scientific and scenic characteristics are important for all humankind. Establishing a wapiti HOSI and promoting hunter management is a threat to those values. It would also be breaking the

¹ New Zealand ecosystems have very high numbers of endemic species – **80% of native plants** are endemic, 70% of native terrestrial and freshwater birds, all the native bat, amphibian and reptile species, and 90% of our native freshwater fish are found nowhere else in the world.

promises the New Zealand Government made in nominating Te Wāhipounamu for World Heritage status and accepting the listing to maintain “*strenuous efforts to limit the influence of these animals in important key areas.*”² National parks are such areas.

7. The September 1989 World Heritage nomination document for South-West New Zealand Te Wāhipounamu prepared by the NZ Government said, “*The only major factor detracting from the integrity of the Gondwana heritage is the pervasive influence of wild introduced animals, such as rats, stoats, feral cats, possum, deer and thar in the 1000 years since the arrival of humans in Aotearoa. Their impact has been enormous, particularly because in their absence the South-West’s plants and animals of ancient lineage have not had to evolve protective mechanisms.....browsing herbivores have had a serious impact on the regeneration of palatable plant species in forest and alpine communities..... This integrity limitation ... is not considered to negate the international importance of the nomination; there is little more that can be done except keep up the strenuous efforts to limit the influence of these animals in important key areas.*”³

8. Making 190,700 ha. or 15% of Fiordland National Park into a game park threatens the characteristics for which Te Wāhipounamu South-West New Zealand was inscribed on the World Heritage list . One of the key characteristics was the diversity and continuity of its natural vegetation sequences, (altitudinal, across rainfall and temperature gradients, north to south gradients, ecotones between wetlands, grasslands, shrublands and forests, and the sequences on vegetation and soils on different aged landforms)⁴. With browsing animals accepted as the biggest threat to the Te Wāhipounamu the wapiti HOSI and the proposed HMP is a reason to advocate to UNESCO for adding the area to the World Heritage in Danger list⁵. This would further undermine Aotearoa New Zealand’s international reputation for conservation management.

Poor process and inadequate information

9. The plan and this consultation process ignores existing law, is premature, lacks transparency, and has significant information gaps.

10. The plan has been drafted and the HOSI is being formally proposed and consulted on ignoring the requirements of section 4(2)(b) of the National Parks Act that any exemption from the Act’s requirement that “*introduced... animals shall as far as possible be exterminated*” must be authorised by the NZ Conservation Authority . There is no reference to the Authority in the designation process and timeline.⁶

11. The process timeline assumes that Parliament will pass the Game Animal Council Amendment Bill 2025 and that the wapiti HOSI will be established. This assumption and the Minister’s strong support for the HOSI in the plan foreword suggests that the wapiti HOSI is a fait accompli and the public consultation process is simply a tick box exercise. This risks undermining public confidence in the rule of law and departmental and Ministerial decision making.

12. The plan is not robust or evidence based. It has been prepared with no detailed scientific information on current wapiti numbers, the health (or otherwise) of existing vegetation cover,

² Government of New Zealand (Sept 1989) Nomination of South-West New Zealand (Te Wāhipounamu) for inclusion in the World Heritage List at p57.

³ Government of New Zealand (Sept 1989) Nomination of South-West New Zealand (Te Wāhipounamu) for inclusion in the World Heritage List at p57.

⁴ Government of New Zealand (Sept 1989) Nomination of South-West New Zealand (Te Wāhipounamu) for inclusion in the World Heritage List at p 16.

⁵ <https://whc.unesco.org/en/danger/>

⁶ <https://www.doc.govt.nz/nature/biodiversity/wild-animals-management/waipiti-deer-proposal-for-a-herd-of-special-interest/>

the presence of threatened plant species and the extent of current impacts of deer and wapiti browsing. It largely ignores the extensive scientific literature on the impacts of ungulate browsing (see the extensive bibliography appended to the Forest and Bird submission). There is no assessment of potential effects of the designation of a HOSI on Fiordland National Park or Te Wāhipounamu World Heritage Area and their natural and cultural values. It has no cost benefit analysis of the costs of establishing and operating a HOSI and the alternative ways of managing wapiti.

13. Effects assessment usually help inform public submissions and enable comment on their adequacy or otherwise and any gaps. Instead the effects assessment of impacts on the World Heritage Area is to be done after public submissions have closed. Departmental statements that “*any potential impacts [on the WH area] would be considered in the final design of a HOSI and the development of a herd management plan*”⁷ are meaningless when they will be done with no public scrutiny.

14. A HOSI will obviously benefit hunters. The HMP includes no analysis, evidence or statement of whether or how a HOSI would benefit FNP, manawhenua, the New Zealand public or other recreational users.

HOSI unnecessary

15. The HOSI plan is not needed, given the existence of a “community agreement” between the FWF and DoC under the Conservation Act. The Fiordland Wapiti Foundation could apply to the NZ Conservation Authority under section (4)(2)(b) of the National Parks Act for a ruling that wapiti are exempt from extermination in the park (subject to ecological analysis on the impacts of wapiti browsing and the wapiti area being significantly reduced from the 190,700 ha. proposed). The “community agreement” could then continue.

Harm to Fiordland National Park

16. Even without a HOSI, the Foundation and hunting interests have been able to strongly influence conservation management in Fiordland National Park for decades to benefit red deer and wapiti to the detriment of forest health. The “community agreement” formalises this. Hunter influence has meant that for years DoC has done no aerial 1080 control for possums and mustelids over the ‘wapiti area’ around 15 % of Fiordland National Park. Establishing a HOSI would result in even stronger hunter influence on park management at the expense of indigenous biodiversity.

17. The National Parks Act needs review, including to properly implement Te Tiriti o Waitangi commitments. The Act and national parks’ core purpose, however, is increasingly important in the current biodiversity crisis, that is - to “*preserve in perpetuity as national parks, for their intrinsic worth and for the benefit, use and enjoyment of the public, areas of New Zealand that contain scenery of such distinctive quality, ecological systems, or natural features so beautiful, unique, or scientifically important that their preservation is in the national interest.*”

18. Aotearoa New Zealand’s unique native plants and wildlife evolved in the absence of browsing ungulates such as deer and wapiti. They are not adapted to withstand the impacts such browsing causes on individual species, ecosystems and whole landscapes. As Professor Bruce Clarkson has said, “*Research shows that the low levels of animal numbers need to be maintained at decadal scales to ensure regeneration and maintenance of native flora and vegetation are unlikely to be achieved by most conventional hunting and culling*

⁷<https://www.doc.govt.nz/nature/biodiversity/wild-animals-management/waipiti-deer-proposal-for-a-herd-of-special-interest/>

*practices..... Unfortunately, obfuscation and misinformation on the impacts of ungulate browsers are perpetuated by vested interests. The inconvenient truth is that introduced ungulates and the sustainable protection and conservation of New Zealand's flora and vegetation, characteristic of a long-isolated island archipelago, are essentially incompatible*⁸

19. The HOSI plan puts hunter management of wapiti and red deer with “wapiti traits” ahead of protecting the park in its natural state and the health of its alpine habitats, native forests, tussocklands, shrublands, rivers and wetlands.

20. The impacts of browsing ungulates on native forest ecosystems and grasslands have been extensively documented and scientifically researched. These impacts include forest degradation with a much less abundant and dense forest understorey, reduced biomass of species preferred by deer, and the failure of canopy species to regenerate. Species which are less palatable to deer such as Crown fern and horopito/pepperwood increase, while those which are palatable (such as broadleaf) disappear, creating an open under-storey and woodlands. Wider impacts include changes to soil processes, increased soil erosion, changes to river beds from increased sediment and bed loads, and downstream flooding. The plan largely ignores the science about deer impacts.

21. Minister Meager has claimed in the media that the HOSI will increase tourism and is “*an opportunity for economic growth*”⁹. National parks provide iconic images for tourism promotion and are a major reason international visitors come to Aotearoa. Most visitors come to see our distinctive indigenous plants, wildlife and landscapes not invasive browsers. Trophy hunters can already hunt for deer and tahr on private “safari parks” on pastoral lease and private land in the South Island and for deer on game estates in the central North Island. We not need to sacrifice Fiordland National Park to deer and wapiti browse to enable hunting tourism.

22. However well intentioned, the Fiordland Wapiti Foundation's ground control methods to trap stoats and rates are unable to match aerial 1080 operations in challenging environments such as Fiordland in terms of their effectiveness, scale of control, and cost per hectare and area controlled. Trap lines are generally restricted to valley floors and gentler hill country. The Foundation efforts using 550 traps in 2023 killed 74 rats and 67 stoats.¹⁰ Such small scale predator control over 190,000 ha. has extremely limited effect.

Te Tiriti o Waitangi/ Treaty of Waitangi principles not given effect to

23. The plan does not not implement Treaty of Waitangi principles as section 4 of the Conservation Act requires, nor recognise the cultural and spiritual significance of landscapes in Fiordland National Park to Māori. The Tūtoko area has tōpuni status under the Ngāi Tahu Claims Settlement Act making it specially protected because of its cultural and spiritual importance . The draft plan proposes consultation with Ngāi Tahu after the plan has been approved. The extent of Ngāi Tahu involvement in the drafting of the plan is unclear. The objectives and strategies do not require GAC or FWF to “*recognise and provide for* “ the views of iwi and hapū and effectively treat Ngāi Tahu as a stakeholder, rather than the Treaty partner.

24. The HOSI plan and its tolerance of ongoing browser damage in FNP is a form of colonisation because it promotes harming of indigenous species, and the degradation of indigenous habits, ecosystems and landscapes. It represents nineteenth century colonial

⁸ Clarkson, Bruce Submission on Game Animal Council Amendment Bill 2025

⁹ <https://www.thepress.co.nz/nz-news/360734807/more-bang-your-buck-how-hunting-has-become-one-nzs-top-tourism-earners>

¹⁰ <https://fwf.net.nz/about-us/annual-reports/annual-report-2023/animal-management/>

attitudes where introduced acclimatised species were seen as superior to those indigenous to Aotearoa.

No evidence that recreational hunting management works

25. Nowhere in Aotearoa has recreational and trophy hunting management been successful in controlling animal numbers to protect forest, shrubland and alpine grassland health. Hunting and conservation priorities and interests differ. Hunters want to maintain easy access to animals, and encourage large animals with big trophy heads. Effective conservation focuses on best outcomes for indigenous biodiversity and reducing browser numbers as low as possible.

26. A HOSI for wapiti and the proposed plan's reliance on recreational hunters to manage wapiti will repeat the failed approach of the Himalayan Tahr Control Plan 1993. Recreational and trophy hunting has been completely unable to control or reduce the Himalayan tahr population below the 10,000 animal limit in that statutory plan prepared under the Wild Animal Control Act. The tahr population on national park and conservation land in the central Southern Alps had increased to between 26,522 and 44,821 animals by 2019, more than three times the 10,000 animal population allowed by the Tahr Control plan. Inadequate control means tahr have been able to expand their feral range. Wapiti and red deer will do the same.

27. DoC's implementation of the Himalayan Tahr Control Plan has been strongly influenced by the Himalayan Tahr Management Liaison Committee. It is dominated by hunting representatives. For decades they strongly opposed culling of tahr including in Aoraki/Mt Cook National Park, to implement section 4(2)(b) of the NP Act. This was despite considerable evidence of increasing damage to fragile alpine soils, alpine grasslands and threatened species such as the Mt Cook buttercup. A wapiti HOSI over 190,700 ha of FNP overseen by the Game Animal Council and operationalised by FWF is likely to obstruct effective conservation management and professional culling and control of deer, wapiti and other ungulates, and Wild Animal Recovery Operations (WARO) operations.

Objectives

28. *"Preventing the loss of indigenous species from their current range"* in Objective 1 potentially allows significant reduction in the population and extent of plant and animal species while seeking to avoid local extinction. That is inadequate and unambitious and would allow significant browsing impacts.

29. What the HMP is seeking to achieve and by when is not clear in the plan. There is no SMART ecological goal in the HMP – specific, measurable achievable, relevant and time bound to focus management.

30. There is no plan objective supporting the use of aerial 1080 to control possums and other browsers. Its absence is likely to constrain DoC's use of 1080, delay or stop operations or make them more costly because GAC and the FWF oppose them and/or insist on the use of deer repellent. Restricting aerial 1080 operations further jeopardises forest and threatened plants and wildlife.

Strategies

31. There is no strategy to implement Objective 1 (maintenance of natural biodiversity and restoring of ecological processes) which creates significant uncertainty about how and whether the Objective will be implemented.

32. How the objectives are to be achieved is very uncertain because of the vague woolly language used and the aspirational tone of many objectives with frequent use of “Seek to ..”

33. An effective herd management plan would have solid environmental limits on what vegetation recovery will be achieved within a clear time frame and what the maximum wapiti population will be within specific ecological units. These limits are missing, making the purpose of the HOSI and what, if anything, it will achieve for conservation uncertain.

34. Wapiti control targets are needed for the public to have any confidence of what the HOSI will mean in practical terms. Strategy 4.1 proposes that control targets be set in an Annual Operational Plan. The targets should have been included in the draft HMP. There is no transparency or accountability if the public cannot assess and comment on the adequacy of limits through this submission process.

35. Professor Bruce Clarkson has noted a further challenge around understanding and monitoring of wapiti and red deer numbers, “*We currently lack any well-researched and tested methods for estimating absolute densities of animals.*” The HOSI and the draft HMP are being built on foundations of sand.

Costs

36. There is no detail on the expected costs of the HOSI. In a briefing to the Minister on the wapiti HOSI, DoC estimated that monitoring and management would cost \$457,000 with the FWF proposing that DoC fund vegetation monitoring, There would also be reporting processes, compliance, review and other costs. The full costs are not stated or analysed in the draft plan. The briefing stated that “*DoC considers we will be able to fund HOSI operation costs proposed to be covered by DoC, via internal reprioritisation*”. So establishing the HOSI will be at the expense of other conservation work. The plan does not set out the opportunity costs for biodiversity or recreation management and other programmes of funds being directed instead to legitimising deer damage.

37. The ongoing under-investment in tackling the biodiversity crisis and this government’s cuts to conservation funding are an inadequate reason to shift to hunter management in an effort to generate revenue from third party sources through the ballot fee.

HOSI would promote exclusive rights to the detriment of public access

38. An estimated 195,000 New Zealanders enjoy hunting. Hunters already have free access to virtually all of the conservation estate,¹¹ including FNP. There are no legal barriers or impediments to hunting in the park. DoC provides hunting permits for free through a simple online process. Establishing a HOSI and using a ballot to restrict and charge for access and the objectives around revenue generation would establish a a “pay to play” model. This is contrary to section 4(2)(e) of the NP Act which guarantees the public “*freedom of entry and access to the parks...*”¹² . It risks incentivising management which generates hunter satisfaction (e.g through guaranteeing kills by allowing animal numbers to increase) at the expense of preserving and protecting national park values.

39. The Game Animal Council Act does not include recreational hunting as a management purpose for herds of special interest. So the HOSI need not be managed to help ordinary hunters.

¹¹ Except for a small number of nature reserves such as Farewell Spit where all members of the public need DoC’s permission to access.

¹² Subject to the provisions of the NP Act and “such conditions and restrictions as may be necessary for the preservation of native plants and animals or for the welfare in general of the parks.” (section 4(2)(e) NP Act.

40. Ballot management provides access for a privileged few who can afford the fee to enter the ballot and who are successful in it, including overseas trophy hunters, and commercial hunting guides. It excludes other hunters, and could potentially exclude public access to the balloted hunting blocks if these are closed for claimed reasons of public safety. No other recreational users are able to exclude the wider public from national parks in this way and gain privileged access.

Decision sought

41. The Fiordland Wapiti HOSI and the herd management plan not proceed and the Department move to develop a national Deer Control Strategy with other agencies such as MPI.

A handwritten signature in black ink, appearing to read 'E M Sage', written in a cursive style.

Eugenie Sage

Anaru Shadbolt - Te Tira Whakamātaki

Submission Details

Eirwen Harris Mitchell

From: Anaru Shadbolt s9(2)(a)
Sent: Monday, 8 December 2025 12:56 pm
To: wapitiHOSIHMP
Cc: Melanie Mark-Shadbolt; s9(2)(a); s9(2)(a); s9(2)(a); s9(2)(a)
Subject: Submission on the Fiordland wapiti Herd of Special Interest
Attachments: Wapiti herd submission - Final.pdf
Categories: Green category

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

Tena koe,

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

Mauri ora,

Anaru Shadbolt

he/him

Kairuruku Rauhi & Ihirangi Matihiko
Digital Content & Engagement Coordinator



To:

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



Draft herd management plan for proposed Fiordland wapiti Herd of Special Interest

Whatungarongaro te tāngata, toitū te taiao

From:

Te Tira Whakamātaki
48 Church Street
Rangiora 7400
North Canterbury
admin@ttw.nz
Contact: Melanie Mark Shadbolt, CEO

Executive Summary

Te Tira Whakamātaki strongly opposes the proposed designation of a Fiordland Wapiti Herd of Special Interest and the associated Draft Herd Management Plan.

Fiordland National Park is one of the most protected and ecologically significant landscapes in Aotearoa. It forms the backbone of Te Wāhipounamu Southwest New Zealand World Heritage Area, recognised globally for its unique and ancient biodiversity, and for representing outstanding natural values on behalf of all humankind.

Establishing a framework that manages an invasive ungulate hybrid for hunting outcomes inside a World Heritage Area is a profound departure from conservation principles. It risks undermining the integrity of the National Parks Act, weakens Treaty responsibilities, and erodes the international standing of Aotearoa as a leader in biodiversity protection.

The Draft Herd Management Plan embeds recreational and commercial hunting priorities throughout its objectives and strategies. It privileges herd genetics, trophy quality, hunting experience, and fee-based revenue generation ahead of ecological restoration. Although the plan uses conservation language, it does not require ecological improvement or meaningful recovery of indigenous forest or alpine ecosystems, nor does it commit to reducing wapiti impacts to ecologically safe levels.

Fiordland's ecosystems are already severely impacted by introduced deer species. DOC's own documents confirm that browsing suppresses forest regeneration, shifts plant communities, threatens taonga species, and degrades alpine herb fields and beech forest resilience. Future recovery will require intensive, science guided ungulate control, not the maintenance of a permanent hunting population.

The proposal also conflicts with the Crown's responsibilities to Ngāi Tahu under the Treaty of Waitangi and subsequent settlement legislation. The plan positions Ngāi Tahu as participants rather than shared decision makers and does not align with whakapapa-based responsibilities to protect taonga species or respect culturally significant landscapes.

Te Tira Whakamātaki urges the withdrawal of the Draft Plan and recommends that no Herd of Special Interest be designated in Fiordland National Park.

1. Introduction

Te Tira Whakamātaki is an independent Māori environmental organisation committed to strengthening Indigenous governance, protecting taonga species, and supporting whānau, hapū, and iwi to exercise kaitiakitanga.

Fiordland National Park is not just a conservation area. It is a taonga of global and intergenerational significance, inscribed by UNESCO as part of Te Wāhipounamu Southwest New Zealand World Heritage Area. UNESCO recognises Fiordland for its exceptional biodiversity, unmodified ecosystems, cultural heritage, and representation of Gondwanan origins. The Glaisnock Wilderness Area, within the proposed Wapiti Area, represents one of the most intact wilderness environments on the planet.

To propose a management plan that protects and enhances a herd of introduced wapiti red deer hybrids for hunting purposes within such a place is unprecedented and deeply concerning. The Draft Plan opens with an acknowledgement of Fiordland's unique values yet proceeds to justify the institutionalisation of invasive species management for recreation and economic benefit. This is a significant shift away from the purpose of national parks and from the conservation first approach underpinning Te Wāhipounamu's World Heritage status.

Te Tira Whakamātaki opposed the Herds of Special Interest framework during select committee consideration of the Game Animal Council Amendment Bill. That submission identified the ecological, legal, and cultural risks of elevating introduced ungulates above conservation objectives. Those concerns are magnified in Fiordland.

2. Core Legal and Conservation Concerns

2.1 Contradiction with National Park purposes and World Heritage obligations

The National Parks Act requires that introduced species be removed as far as possible to protect natural ecosystems. The Draft Plan relies on legislative changes that would override this requirement.

The Wapiti Area sits entirely within Fiordland National Park, and mostly within Te Wāhipounamu World Heritage Area. UNESCO requires New Zealand to maintain the outstanding universal values that form the basis of inscription. Managing an invasive ungulate herd for trophy hunting undermines ecological integrity, forest regeneration, and wilderness character.

This proposal risks breaching World Heritage operational guidelines and invites scrutiny from the UNESCO World Heritage Committee. DOC's own support document acknowledges the need for contact with UNESCO and confirms that an assessment of effects on World Heritage values will be required before any decision proceeds. This is

an extraordinary indication that the plan itself poses potential threats to international obligations.

2.2 The Draft Plan embeds hunting priorities rather than conservation priorities

Every primary objective and strategy centres on enhancing hunting experience, improving herd genetics, generating revenue, encouraging hunting participation, and building commercial partnerships. Examples include:

- Enhancing the wapiti herd to produce high quality bulls for balloted hunters
- Maintaining a specific sex ratio designed for hunting, not ecological recovery
- Establishing fee-based hunting systems designed to make the plan self-funded
- Promoting Fiordland wapiti hunting to domestic and international markets

These objectives do not align with the conservation purpose of Fiordland National Park or the requirement to protect indigenous ecosystems.

2.3 Ecological evidence demonstrates severe and ongoing harm

The supporting documents confirm:

- Deer browsing suppresses forest regeneration, shifts plant communities, and threatens biodiversity in both forest and alpine ecosystems.
- Regeneration is slow, location specific, and costly, even with intensive management.
- Recovery is hindered by competition from deer avoided species, leading to long term compositional changes.
- Alpine herbfields and preferred alpine herbs show measurable browsing pressure, contributing to declines in sensitive species.
- Wapiti red hybrids cannot be physically separated, ensuring that browsing pressure remains widespread.

Monitoring data using seedling ratio index and alpine browse surveys that DOC references elsewhere is unequivocal. Indigenous forest and alpine vegetation in Fiordland remains under significant pressure from deer. Maintaining a deliberately structured herd, with ongoing browse impacts, is incompatible with ecological restoration.

2.4 Recreational hunting and hybrid selection do not deliver ecological recovery

The Draft Plan asserts that managing wapiti for hunting will improve conservation outcomes yet provides no evidence that such an approach reduces browsing impacts.

DOC's own statements contradict this assumption. Recreational hunter returns account for fewer than 100 deer during the bugle period. Outside of this period, the department states it has no data on recreational take and acknowledges that recreational hunting alone is insufficient to control populations.

Hybrid selection targeting animals with fewer wapiti traits is framed as a conservation tool, yet this is a hunting driven genetic management approach rather than an ecological one. No evidence is presented that selective harvesting reduces browsing pressure or supports regeneration of palatable species.

3. Ecological Evidence of Harm in Fiordland

3.1 Forest ecosystems

Fiordland's beech and podocarp forests hold taonga species and represent globally significant ecosystems. The Draft Plan acknowledges that:

- Deer browse suppresses regeneration
- Preferred species remain disproportionately damaged
- Long term shifts in canopy replacement threaten ecosystem resilience
- Deer impacted forests show reduced capacity to withstand climate change driven disturbances

These effects are cumulative and exacerbated by maintaining populations rather than removing them.

3.2 Alpine herbfields and sensitive alpine ecosystems

Alpine environments in Fiordland are exceptionally fragile. The support document outlines monitoring that shows significant impacts on:

- Preferred alpine herbs
- Herbfield resilience
- Recruitment rates of sensitive species
- Distribution and availability of high-altitude vegetation communities

These ecosystems recover only with significant reductions in ungulate density.

3.3 Wilderness values at risk

The Glaisnock Wilderness Area is internationally rare. Wilderness areas require minimal human influence and high levels of ecological intactness.

A hunting managed herd of invasive deer is incompatible with wilderness policy and undermines the value of the area as a global conservation asset.

4. Treaty of Waitangi and Cultural Concerns

4.1 Failure to uphold Treaty partnership and Ngāi Tahu rangatiratanga

Ngāi Tahu hold rangatiratanga over Fiordland National Park through the Ngāi Tahu Claims Settlement Act, Deed of Settlement, and Deed of Recognition. Lake Te Anau and surrounding areas are culturally significant and protected under multiple statutory instruments.

The Draft Plan:

- places Ngāi Tahu in a consultative role rather than shared decision making
- does not align with partnership principles
- does not give effect to Ngāi Tahu cultural values
- positions tikanga and mātauranga as optional inputs rather than foundational frameworks

This is inconsistent with section 4 of the Conservation Act and with the settlement relationship.

4.2 Cultural responsibilities to protect taonga species

Taonga flora and fauna within the Wapiti Area include whio, kea, mōhua, tokoeka, tawaki, and numerous indigenous plant species. These species are directly threatened by continued browsing pressure.

Protecting an invasive ungulate population conflicts with Ngāi Tahu responsibilities of kaitiakitanga and with whakapapa-based relationships to the whenua.

5. Concerns with Governance and Process

5.1 The enabling legislation lacks evidence, justification, and conservation rationale

The select committee report confirms that the Herds of Special Interest framework is not supported by scientific evidence or public interest analysis. It was criticised by multiple

parties, including the New Zealand Conservation Authority, for undermining conservation principles.

Building a Fiordland specific plan on this weak legislative foundation introduces similar governance risks and conflicts.

5.2 Delegating management influence to hunting sector organisations is inappropriate in a World Heritage Area

The Draft Plan envisions significant roles for the Game Animal Council and the Fiordland Wapiti Foundation. While their community efforts are acknowledged, delegating influence over herd management and ecological monitoring in a World Heritage Area undermines DOC's scientific independence and public accountability.

5.3 International reputation risks

Designation of a hunting managed herd of invasive deer in a World Heritage Area may trigger formal concern from UNESCO. This risks New Zealand's reputation as a global conservation leader and may affect the standing of Te Wāhipounamu on the World Heritage List.

6. Alternative Approaches

Te Tira Whakamātaki supports:

- Indigenous led conservation models
- Intensive ungulate control for ecological restoration
- Strengthened partnerships with Ngāi Tahu
- Restoration of wilderness values
- Removal of hunting driven frameworks from conservation decision making

Fiordland requires ecological intervention, not enhancement of browsing populations.

7. Recommendations

Te Tira Whakamātaki recommends that:

- 7.1. The Minister for Hunting and Fishing does not designate a Fiordland Wapiti Herd of Special Interest.
- 7.2. The Draft Herd Management Plan is withdrawn.

- 7.3.DOC reaffirms the primacy of ecological restoration and wilderness protection in Fiordland National Park.
- 7.4.Management of deer in Fiordland prioritises removal or suppression using mātauranga and science-based tools.
- 7.5.All decisions affecting Fiordland give effect to Ngāi Tahu rangatiratanga, partnership, and settlement obligations.
- 7.6.Contact with UNESCO continues and concerns about World Heritage integrity are formally considered.
- 7.7.No recreationally driven ungulate management frameworks are implemented within Te Wāhipounamu.
- 7.8.Conservation funding and monitoring capacity are strengthened.

8. Conclusion

Fiordland is one of the most important conservation landscapes in the world. The Draft Fiordland Wapiti Herd of Special Interest Management Plan would create a hunting focused management regime that undermines ecological integrity, Treaty responsibilities, and international obligations.

Wapiti red hybrids are invasive ungulates that continue to degrade forest and alpine ecosystems. Their management must prioritise ecological recovery, not recreational outcomes. The Herd of Special Interest framework is fundamentally incompatible with the purpose of national parks and the values of Te Wāhipounamu.

Te Tira Whakamātaki urges the Minister to reject this proposal and to work with Ngāi Tahu and Māori conservation organisations to restore Fiordland’s mauri and uphold our shared responsibilities to future generations.

Nā mātou

Melanie Mark Shadbolt

Tumu Whakarae, Chief Executive Officer

Te Tira Whakamātaki

Grant Sheridan - Hunting & Fishing NZ

Submission Details

Eirwen Harris Mitchell

From: Grant Sheridan s9(2)(a)
Sent: Monday, 8 December 2025 7:33 pm
To: wapitiHOSIHMP
Cc: s9(2)(a)
Subject: HFNZ Submission
Attachments: HF NZ - Draft Herd Management Plan FWF HOSI - FINAL.pdf
Categories: Green category

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Please find attached the HFNZ submission on the draft herd management plan for the Draft Herd Management Plan – Fiordland Wapiti HOSI.

Regards and thanks

Grant Sheridan

Grant Sheridan
Chief Executive Officer



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

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8 December 2025

Department of Conservation,
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Christchurch 8140
Attn: Wapiti HOSI draft HMP submissions

Email: wapitihosihmp@doc.govt.nz

Draft Herd Management Plan – Fiordland Wapiti HOSI

Hunting & Fishing New Zealand

1. This submission is on behalf of Hunting & Fishing New Zealand.
2. Established in 1986 Hunting & Fishing New Zealand now represents the 40 retail stores across New Zealand with combined annual earnings of approximately \$200 million. We have a consumer database of more than 150,000 with over 130,000 followers on social media.
3. Hunting & Fishing New Zealand is a leading national retailer of hunting, fishing, outdoor, and sporting equipment, serving a community of 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

Overview

4. As a hunting, fishing, outdoor and sporting goods retailer, Hunting & Fishing New Zealand supports changes to legislation that will improve the sustainable management of game animals and hunting and increase hunting opportunities whilst supporting ongoing conservation initiatives throughout New Zealand.
5. Hunting & Fishing New Zealand supports and works closely with the hunting sector and recognises the immense amount of positive work organisations such as the Game Animal Council, New Zealand Deerstalkers Association, Fiordland Wapiti Foundation, Central North Island Sika Foundation and Tahr Foundation do to ensure that:
 - a. The activity of hunting is encouraged,
 - b. Game animals are sustainably managed, and
 - c. Conservation outcomes are improved.

6. 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.

 7. 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.
 8. 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.
 9. Hunting & Fishing NZ customers travel from across New Zealand and internationally to hunt Fiordland wapiti. These hunters make significant investments in hunting equipment and drive national and regional economic growth.
 10. 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.
 11. This is achieved through the annual ballot providing hunters with a world-class hunting experience during the wapiti bugle.
 12. 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.
 13. Wapiti herd numbers are maintained at a level that enables and promotes the regeneration of browsed indigenous plants.
 14. 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 and kea.
-

15. Hunting & Fishing New Zealand supports initiatives that increase the quality, value and recognition of game animals and hunting across New Zealand and the designation of a HOSI will continue to raise the profile of this species.
16. Hunting & Fishing New Zealand supports initiatives that promote hunters, hunter values and the contribution that hunters make across New Zealand.
17. Hunting & Fishing New Zealand supports the designation and implementation of Herds of Special Interest (HOSI).
18. Hunting & Fishing New Zealand 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.
19. Hunting & Fishing New Zealand supports the concept of HOSI because it helps ensure these species, and the hunting of them, remain a valued part of New Zealand's social fabric.
20. Hunting & Fishing New Zealand supports the concept of HOSI because it reinforces the value of hunting and strengthens the role of hunters and other entities in responsible game animal management.
21. Hunting & Fishing New Zealand submits that the HOSI framework is critical for aligning hunting, community, and conservation values at place, enabling improved outcomes for game animals, hunters, recreational users, and conservationists, acknowledging that these groups frequently overlap.
22. Hunting & Fishing New Zealand 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.
23. Hunting & Fishing New Zealand has reviewed the Draft Herd Management Plan (the draft HMP) and recommends amendments to the draft Plan to reflect the intent of a Herd Management Plan so that it aligns with the intent of the Game Animal Council Act and the value associated with Fiordland wapiti and the hunting of wapiti.

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

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’.

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.

	Position	Recommendation
Objective 1	<p>Support with amendments.</p> <p>This is primarily a Herd Management Plan, not a control plan.</p>	<ul style="list-style-type: none"> - Submit that Objective 1 be reframed to be should only relate to wapiti impacts and their management. - 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.?
Objective 2	Support.	
Objective 3	<p>Support with amendments.</p> <p>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>	<ul style="list-style-type: none"> - Reframe Objective 3 to clarify who the hunting community is and provide for some costs (likely administrative) to fall upon the Crown.

Objective 4	Support the intent, however the objective currently doesn't emphasize the right outcome. The outcome reads as if hunters are still only being recognized as 'tools' for control as per the Wild Animal Control Act 1977 language.	- Amend to 'Build or maintain hunter and community involvement to manage the herd, increase the value of the herd and enhance conservation outcomes that promote the health of indigenous species'.
Objective 5	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.

Strategies		
Use a range of tools to manage the Fiordland Wapiti Herd of Special Interest and improve the hunting experience.		
Commentary 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.		
General		
	Position	Recommendation
1.1	<ul style="list-style-type: none"> - This section needs to be reframed to increase the recognition of the values of the herd. - The term 'wapiti control' needs to be removed as this is a management plan and not a control plan. - 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. 	<ul style="list-style-type: none"> - The Strategies need to focus on herd health and the habitat through sustainable management.

	<ul style="list-style-type: none"> - Game animal management is a long-term approach; it is not a one and done 'control' approach. 	
1.2	Support in principle with amendments.	<ul style="list-style-type: none"> - 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: - Amend 1.2 a) protects and enhances the wapiti hunting experience.
Recreational hunting		
	Position	Recommendation
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> <ul style="list-style-type: none"> - 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. 	<ul style="list-style-type: none"> - 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 inline with the Game Animal Council Act 2013.</p> <ul style="list-style-type: none"> - The term 'control activities' should be removed as this is a management plan and not a control plan. 	<ul style="list-style-type: none"> - 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.	
Commercial recovery and professional control activities		
	Position	Recommendation
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 the purpose was to remove as many deer as possible.</p>	<ul style="list-style-type: none"> - 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’. - 1.9 a, b, c, d) remove all terminology associated with professional control activities and replace with professional management activities. - 1.9 c) Amend to clarify the purpose and meaning.
Monitoring		
Commentary		
<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. 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.</p>		
	Position	Recommendation
2.1	<p>Support with amendments.</p> <ul style="list-style-type: none"> - 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. 	<ul style="list-style-type: none"> - Amend 2.1 a) Remove faecal pellet counts. - Amend 2.1b) Add the Game Animal Council and

	<p>Monitoring should only reflect the impact deer have on the environment.</p> <ul style="list-style-type: none"> - 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. - It is likely that DOC will provide sufficient representation of conservation values when discussing new monitoring methods, tools and technologies. - 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>remove Conservation Boards.</p> <ul style="list-style-type: none"> - 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. - Submit that 2.1 c) is amended from 'control targets' to 'herd management' as game animals are a valued introduced species.
2.2	<p>Support with amendments.</p> <ul style="list-style-type: none"> - 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. - 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. 	<ul style="list-style-type: none"> - Amend 2.2 to, Undertake ecological monitoring in accordance with best practice methods and standards.
Research		
	Position	Recommendation
2.4	Support	
2.5	Support	
2.6	<p>One of the main purposes of the HMP is to manage the herd for its hunting value. Therefore, research to better understand the management of the HOSI should also investigate the hunter experience.</p>	<ul style="list-style-type: none"> - 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.
Foster partnerships and community stewardship		
	Position	Recommendation
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	
Stewardship		
	Position	Recommendation
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	

Undertake annual operational planning and reporting on management activities.		
Commentary 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. 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.		
Annual operational plan		
	Position	Recommendation
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’.
Commentary 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.		
	Position	Recommendation
4.2	Support with amendments. HOSI changes the status of game animals from ‘pests’ to be controlled for their harmful effects, to ‘valued introduced species’ to be managed for both their values and their impacts. - 4.2 d) Support with amendments.	- Submit that all references to ‘control’ be replaced with ‘management’. - Submit that provisions are made within 4.2d) to protect commercial sensitivities if private businesses or philanthropists wish to partner and donate.
4.4	Oppose in part. It is yet to be determined whether the Game Animal Council or the Department of Conservation will be the statutory management entity for HOSI implementation, therefore the provision is unnecessary and creates undue bureaucracy.	- Delete 4.4 - Clear guidance is needed on whether HOSI falls under DOC or GAC legislation and who the administrative entity is.

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

Yours sincerely

Grant Sheridan
Chief Executive Officer
Hunting & Fishing New Zealand

s9(2)(a)

s9(2)(a)

Agamjot Singh

Submission Details

Eirwen Harris Mitchell

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

Categories: Green category

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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 nui.

Roy Sloan - Fiordland Wapiti Foundation

Submission Details

Eirwen Harris Mitchell

From: Roy Sloan [REDACTED]
Sent: Sunday, 7 December 2025 8:18 pm
To: wapitiHOSIHMP
Subject: Fiordland Wapiti Foundations Submission to the draft herd management plane - HOSI
Attachments: 6_12_25_HOSI -Submission.pdf
Categories: Green category

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Please find attached HMP submission

Thanks

Roy Sloan
On behalf of the Fiordland Wapiti Foundation



Subject: Submission to the Herd Management Plan - the Wapiti Herd of Special Interest

From: The Fiordland Wapiti Foundation.

07/12/2025

The Fiordland Wapiti Foundation was established in 1993 to focus on preserving the Wapiti herd and its habitat. Unlike national groups, the Foundation aimed for a small, healthy Wapiti population that allowed native plants and animals to flourish. It quickly recognised that improving the environment benefited both the Wapiti and conservation efforts, providing advantages for hunters and wildlife alike.

The Fiordland Wapiti Foundation has evolved from a group of recreational hunters dabbling in deer management to a professional organisation with employed staff who specialises in deer management in the most difficult area in NZ.

So, Who Are These Wapiti People?

Originally hunters, we shifted our focus to conservation after recognising that a healthy environment is essential for thriving wildlife. The Fiordland Wapiti Foundation, founded by hunters across New Zealand, now manages the 190,000ha Wapiti Area in Fiordland National Park. Over 20 years, we have removed over 20,000 deer to benefit both the ecosystem and the Wapiti herd's quality, funded directly by hunters.

Beyond deer management, we are committed to native bird protection, operating predator control across five river catchments and contributing over 40,000 hours annually to bird monitoring. We also maintain six backcountry huts. All this takes place in one of New Zealand's most remote, rain-soaked regions, making our work challenging but vital.

Who are the Wapiti people? We are volunteers, builders, lawyers, farmers, labourers, Southlanders, Aucklanders, mothers, daughters, fathers, and sons—We are New Zealanders who care about our part of Aotearoa, its conservation, and its Wapiti deer.



Our submission

- The Fiordland Wapiti Foundation supports the Fiordland Wapiti Herd being gazetted as a Herd of Special Interest.
- The Fiordland Wapiti Foundation supports the HMP as amended by this submission.
- The Fiordland Wapiti Foundation requests that the draft HMP cover image be replaced with a Fiordland Wapiti bull from Fiordland.

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Setting the correct tone for HOSI

A Wapiti HOSI is not about “Control” of Wapiti; it is about “Active Management.” The Wapiti Foundation submit that the draft HMP be amended to remove all reference to the term ‘control’ 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.

Roles and responsibilities

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

Clear guidance is needed by the Government on who should administer the HOSI and who is responsible for implementing the GAC legislation. Currently the FWF is getting mixed messages and roles need to be delegated asap.

Values of the Fiordland Wapiti Herd.

Respect of Heritage. The esteemed Fiordland Wapiti herd was presented as a gift by President Theodore Roosevelt of the United States. Theodore realised that protecting the environment was vital for maintaining healthy deer in the U.S. This sentiment has never been lost to The Fiordland Wapiti Foundation and aligns with the perspectives of Wapiti hunters, and Theodore’s contribution serves as a continual reminder that effective deer management is essential for the conservation of Fiordland National Park.

Many deer herds in New Zealand have lost the attraction from trophy hunters because of both overpopulation and commercial activities. This herd has been preserved due to the commitment of individuals who have devoted their careers to its protection. Prior to the advent of modern technology, efforts were made to regulate the deer population to preserve



Fiordland and Wapiti deer. There is a significant association between Fiordland National Park and Wapiti hunting, a spiritual connection to the place that may not be completely recognised by individuals who are not acquainted with Wapiti activities. Fiordland's Wapiti deer attract visitors to the region, and it is the allure of Fiordland itself that keeps them returning.

We seek that the Introduction, Purpose, and Objectives of the plan are amended to include these values.

1. Recognise the heritage of this herd and how important that is to hunters in New Zealand. The passion that has gone into saving the Fiordland Wapiti herd and the Fiordland Wapiti area.
2. Recognise the Fiordland Wapiti area and deer as an integrated hunting experience. *(Hunting wapiti in New Zealand game parks or farmland is mainly for taking a large trophy bull. A genuine Fiordland experience encompasses adventure and the opportunity to observe or harvest a mature Fiordland Wapiti bull. This experience is unique and only one place on earth that it can occur)*
3. The Fiordland Wapiti herd offers excitement and adventure. *(The feeling of isolation and limited human encounters while hunting and the vastness of Fiordland national park).*
4. Fiordland Wapiti herd and national park promote health and wellbeing. *(When a hunter draws a block, they instantly grasp the physical demands and begin training. Then engulfed in the wildest terrain NZ has to offer its healing powers are immense)*
5. Southland community connection to the Fiordland Wapiti herd. *(Te Anau has a larger-than-life Fiordland Wapiti Statue erected outside their community centre. There is a Wapiti café in Te Anau, the community embraces and celebrates the achievement of the Fiordland Wapiti Foundation).*
6. Economic value to Southland and NZ. *(The Wapiti herd attracts visitors from across the globe. It attracts New Zealanders to the South specifically for Wapiti hunting, these people return to NZ with their family and friends. Fiordland Wapiti Venison is sold across NZ this is processed in the Southland region).*
7. *The Fiordland Wapiti Foundations promotion of conservation in Fiordland and their enduring success in deer management. The Fiordland Wapiti Foundation has influenced perspectives on hunters and conservation. We have led discussions and provided support on the complex issue of deer management. This has transformed perceptions of deer management in New Zealand and globally.*



Summary of Values

1. The heritage of the Fiordland Wapiti Herd.
 2. The Fiordland Wapiti experience.
 3. The Fiordland adventure.
 4. Health and Wellbeing.
 5. Southland connection to the Fiordland Wapiti Herd.
 6. Economic value.
 7. The Fiordland Wapiti Foundation leadership within hunter conservation.
-

3-Objectives and strategies

Objective 1 amendment -Maintain or enhance the current health of forest vegetation, including canopy regeneration and threatened species that can be adversely affected by Wapiti browse, through management of the Wapiti herd.

I would seek that Objective 1 is amended so that it is relevant to the management of Wapiti and achievable. The group responsible for implementing the HOSI should not be placed in a position where they are expected to accomplish unrealistic goals.

Objective 2 amendment- The Fiordland wapiti hunting experience is enhanced, and the Fiordland wapiti herd produces mature trophy bulls for balloted hunters to hunt annually during the bugle.

I seek that Objective 2 is amended to better reflect the Fiordland Wapiti Foundations current goals and values.



Strategies

2-Vegetation Monitoring.

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

Fiordland Wapiti Foundation submit that 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.

Vegetation monitoring should align with what is feasible and financially sustainable for the HOSI. The group responsible for implementing the HOSI should not be placed in a position where they are expected to accomplish unrealistic goals. Fiordland Wapiti Foundation submit that the draft HMP be amended to reflect these monitoring requirements.

Faecal pellet counts. Faecal counts are a subjective way of monitoring deer impacts. Fluctuation occurs with feed qualities, weather events, seasonal change, and animal movement. Faecal counts should not be used as a tool to monitor deer impacts.

Fiordland Wapiti Foundation submit that Faecal Count monitoring be deleted from the draft HMP.

Fiordland Wapiti Foundation submit that section 2.2 be amended to read “Undertake ecological monitoring in accordance with Industry Agreed Best Management.”

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Hunter Satisfaction

Hunter satisfaction will also need to be quantified & tracked with specific surveys that seek feedback on the above measures and/or other measurable hunting outcomes. These are likely to change over time as active management takes effect. Hunter satisfaction is unique for each species of deer and in the case of Fiordland Wapiti satisfaction comes from the challenge that Fiordland adds to the hunt. The feeling of isolation and limited human encounters while hunting and the vastness of Fiordland national park also add to the Fiordland Wapiti experience, so we should not limit hunter satisfaction to the quality of a Wapiti bull shot.

Non- Wapiti hunters do not understand the package on offer with Fiordland Wapiti and Fiordland national park. It is the wapiti that attract hunters to Fiordland, but it is the allure of Fiordland itself that keeps them returning. Hunter believes both elements must go together to be effective.



Subject: Funding Herds of Special Interests. (Wapiti)

Objective: 3-Generate sufficient revenue through partnerships and sponsorships, seek to recover costs from the hunting community, and in-kind support is increased to ensure the delivery of this Plan is wholly or largely self-funded.

- All funds allocated to the Herd of Special Interest (Wapiti) should be sent directly from the funding source to the organisation or group responsible for implementation. In this case the Wapiti Foundation.
- Funding should not be directed to a stationary or government body (Doc/GAC) for discretionary distribution to the Wapiti Foundation.
- Hunters must maintain the status quo. Decisions regarding deer management in the future may be made by an unsupported government entity, potentially disrupting established hunter-led management efforts. The FWF current funding system helps with future proofing Wapiti as a HOSI from an unfavourable Government.
- The Wapiti Foundation currently operates a user-pays system that has successfully transformed hunter-led deer management in New Zealand over the past 20 years. Changing the current system could weaken the trust the Wapiti Foundation has established with its users and supporters.
- The Wapiti Foundation must keep its autonomy, so hunters remain in control of their futures.

Subject: Operational 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 this is case the Fiordland Wapiti Foundation.

The Wapiti Foundation will be held accountable for not meeting the terms of the Herd Management plan. The operation plan must be an adapted management tool that enables good outcomes for Fiordland and for the Fiordland Wapiti Herd.

Section 4.4 Oppose. Delete “Work with the Department when preparing the annual report prior to its finalisation and public release”

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Papatipu Rūnanga

The Fiordland Wapiti Foundation welcomes collaboration with Papatipu Runanga. We see a HOSI as a way to exchange insights and deepen our understanding of Fiordland.

We also have an opportunity to explore various initiatives and discover new methods to improve deer management, not just within Fiordland National Park but across New Zealand as a whole. The Wapiti Foundation would appreciate the opportunity to engage in direct communication with Papatipu Runanga, as we feel that our commitment to and appreciation of Fiordland may not be accurately represented through an intermediary.

Challenge to the Government, Department of Conservation

Deer are very topical at present in NZ. No one has found the silver bullet to control deer. All other deer issues aside. The Fiordland Wapiti Foundation model is as good as it gets.

The Fiordland Wapiti Foundation is working to improve how they manage animals by gaining control over every stage of the venison supply chain.

This could be the only situation in NZ to look at deer management with a holistic lens. We encourage Gac and Doc to embrace change and actively support this opportunity.

Subject: Annual Report: Sponsorship and commercial partnership

Reporting should acknowledge that disclosing sponsorship and partnerships may be commercially sensitive and could discourage sponsor involvement.

The Fiordland Wapiti Foundation is a charity, and its sponsors or commercial partners may also collaborate with it on activities outside of Fiordland.

Annual reports need to be done by the implementor of the HOSI and in this case the Fiordland Wapiti Foundation.

Annual Report (page 14), section 4.2, 4.3, and 4.4 Oppose. Delete 4.2(d) sponsorships and commercial partnerships, and 4.3 financial reporting requirements. This is unnecessary in the HMP.

Thanks

Roy Sloan, on behalf of the Fiordland Wapiti Foundation.



Nicky Snoyink - Forest & Bird NZ

Submission Details

Eirwen Harris Mitchell

From: Nicky Snoyink [s9(2)(a)]
Sent: Monday, 8 December 2025 5:24 pm
To: wapitiHOSIHMP
Subject: Fw: Wapiti HOSI HMP Submission Forest & Bird
Attachments: F&B Submission Wapiti HMP 08122025 .pdf

Categories: Green category

Kia ora,

Please use the attached copy of Forest & Bird's submission on the Wapiti HOSI Draft HMP, with a correction to one reference.

Thank you.

Best wishes,
Nicky

From: Nicky Snoyink
Sent: 08 December 2025 5:00 PM
To: wapitihosihmp@doc.govt.nz <wapitihosihmp@doc.govt.nz>
Subject: Wapiti HOSI HMP Submission Forest & Bird

Good afternoon,

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

Thank you for the opportunity to submit.

Kind regards,
Nicky

Nicky Snoyink

REGIONAL CONSERVATION MANAGER CANTERBURY/WEST COAST

PO Box 2516, Christchurch 8140

M. [s9(2)(a)]

You can join Forest & Bird at www.forestandbird.org.nz or check us out at [Facebook](#) | [Forest and Bird](#)

I work flexible hours Monday – Friday and I don't expect a reply outside of your work hours.



Forest & Bird

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

Wapiti Herd of Special Interest – Draft Herd Management Plan – November 2025

8 December 2025

To: Department of Conservation
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Submitted via email: wapitihosihmp@doc.govt.nz

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SUBMISSION

Introduction

1. Forest & Bird is New Zealand's largest independent conservation organisation. Our mission is to protect New Zealand's unique flora and fauna and its habitat.
2. Thank you for the opportunity to provide feedback on the Draft Herd Management Plan (HMP) for the proposed Wapiti Herd of Special Interest (hereon referred to as the HMP)
3. Forest & Bird strongly opposes the designation of wapiti as a herd of special interest (HOSI) in Fiordland National Park (FNP). FNP is the corner stone of Te Wāhipounamu - Southwest New Zealand UNESCO World Heritage Area (WHA). This WHA is the largest and least modified area of New Zealand's natural ecosystems. The native flora and fauna within this WHA are recognised as the world's best intact modern representation of the ancient biota of Gondwana and meet at least four of the UNESCO WHA outstanding universal values (OUV) criteria.¹ The natural flora and fauna of Fiordland National Park are integral to the WHA OUV.
4. Introduced wapiti/red deer are a recognised threat to the WHA OUV.² As drafted the HMP provides no confidence to Forest & Bird that the WHA OUV in FNP, will be protected and preserved if an introduced species like wapiti is designated as a HOSI and managed for hunting. The Department of Conservation (DOC) has an obligation to ensure the OUV are protected and preserved. Legitimising the presence of an introduced invasive species will

¹ <https://whc.unesco.org/en/criteria/> and <https://whc.unesco.org/en/list/551/>

² <https://whc.unesco.org/en/list/551/>

not protect and preserve the WHA OUV and will most likely result in the long-term degradation of the affected native ecosystems.³

5. To that end, DOC already has tools to manage wapiti in Fiordland National Park, including by community agreements established under the Conservation Act 1987. Designating wapiti as a HOSI and creating another management plan under the Game Animal Council Act 2013 (GAC Act), is confusing, duplication, and it is not needed.
6. The key concern Forest & Bird has with HOSI is the ongoing degradation of protected natural ecosystems by legitimising the presence of introduced browsing animals like wapiti and red deer and shifting their 'management' away from DOC.
7. We are also concerned that charging fees for access to a 'Herd of Special Interest' locks in a 'pay-to-play' model that risks incentivising the maintenance of higher animal numbers of wapiti than what is necessary to maintain and protect WHA OUV, to ensure customer satisfaction (hunter success). This creates a perverse financial incentive for DOC, Game Animal Council (GAC) or any third party involved in management to degrade conservation values to generate revenue. It risks turning the wapiti area of the national park into a commercial game hunting estate.
8. Furthermore, we are concerned about the absence of analysis of the follow-on impacts from designating HOSI. These are being created through political decision to accommodate recreational hunting interests without analysis of their impact upon wider ungulate control efforts. Establishing HOSI will set a precedent that erodes conservation legislation – essentially farming pest animals on public conservation land. This will occur in a national park, the highest form of public conservation land and in a World Heritage Area.
9. Designating a HOSI creates a risk that pest control may become more difficult in these places. Forest & Bird are concerned that a HOSI will be a barrier to DOC's ability to carry out pest control operations to protect and preserve indigenous biodiversity. Some hunting groups are opposed to the use of 1080 as there is a risk that deer are killed, yet 1080 is most effective method of pest control. The HMP must be clear that the HOSI designation will not be used to obstruct pest control operations, like the use of 1080.
10. Forest & Bird is concerned that in drafting this HMP, DOC has failed to use the available scientific evidence on the impacts of introduced wapiti/red deer on ecological values and to assess the efficacy of 'managing wapiti for hunting purposes' as a HOSI. This is reflected in the objectives, strategies, expected benefits (or lack thereof), the proposed monitoring, and compliance set out in the HMP, which are inadequate. The HMP is more an aspiration than a plan and requires more detail to provide confidence and credibility.
11. Forest & Bird makes the following comments on the draft HMP to assist the DOC in its advice to the Minister of Hunting and Fishing in their decision on whether (or not) to designate wapiti as a HOSI. This feedback provides comments on the following parts of the draft HMP:
 - i. Foreword

³ Clarkson BD. Submission on Game Animal Council (Herds of Special Interest) Amendment Bill. August 2025. https://www3.parliament.nz/resource/en-NZ/54SCENV_EVI_c38a377c-91ac-4983-68f9-08dd90f2ab46_ENV80127/9218613cff7eb3f4359766c9f22778934dc4fa2e

- ii. Introduction and purpose
 - iii. Values and context
 - iv. Objectives
 - v. Strategies
 - vi. Compliance, review, and enforcement
12. Forest & Bird’s recommendation is that the Minister should **not** designate wapiti as a herd of special interest in the Fiordland National Park. The focus instead, should be on co-ordinated collective action to deal with the devastating impacts that expanding populations of introduced wild animals are having on economic productivity and on the environment.

Foreword

13. The HMP foreword acknowledges that the plan seeks to recognise the outstanding universal values of Fiordland National Park, a UNESCO WHA, and the unique place that wapiti have in the WHA. Considering that World Heritage Convention identifies that:

Invasive species are the biggest impact on the property, despite their impacts being restricted to small areas of the property. Population increases of red deer as well as impacts from other browsing mammals such as wapiti, fallow deer, goat, chamois and tahr have caused severe damage in some parts of the property, in particular threatening the integrity of the forest and alpine ecosystems.⁴

14. Wapiti are an introduced invasive species. Suggesting that wapiti have ‘a unique place in the WHA’ is contrary to the purpose of the WHA, which is the protection of the outstanding values of the WHA. Wapiti pose a threat to those values. This part of the foreword should be reframed to recognise the known impacts of wapiti (and other introduced browsing animals) and the severe damage they cause to the WHA.
15. The foreword explains that the Minister ‘expects’ that there will be benefits by managing wapiti as a HOSI. However, those expected benefits are not set out in the HMP itself. The benefits are proposed to be set out in future in a Gazette notice. This is not appropriate. If the Minister can’t describe the benefits in the plan now, this raises questions about whether any benefits actually exist.
16. Evidence-based benefits, including a cost benefit analysis to justify HOSI, should be set out in the HMP, not by a vague note in the HMP foreword. This would help the public understand the value proposition of HOSI and the Minister’s rationale for designating the HOSI (if they decide to do so) so the public can appropriately comment on the benefits and determine whether the proposal can be supported.
17. This HMP is for the management of an activity in a national park and a UNESCO WHA. This place belongs to all New Zealanders. The foreword must contain a clear, evidence-based rationale for the HOSI and why wapiti should be managed for the purpose of hunting in a national park for a small interest group. The HMP itself should contain a separate part reinforcing this and detailing the benefits to the public of managing wapiti as a HOSI. This would assist the public to appropriately comment at this stage of the process. Leaving an explanation of the benefits to a Gazette notice is too late.

Introduction and purpose

18. The HMP introduction contradicts itself. In the purpose, the HMP states:

⁴ <https://whc.unesco.org/en/list/551/>

This Plan applies to all species of animals of the cervus genus (deer) existing in the Fiordland Wapiti Area.

... And then in the application of the Plan and statutory context, it states:

The Fiordland Wapiti Herd of Special Interest designation and this plan apply only to Fiordland wapiti and their management.

19. The HMP goes on to explain that “*there are very few, if any pure-bred wapiti or red deer present in the Wapiti Area.*”
20. This is confusing. The HMP must be explicit about which deer species it applies to.
21. In the application section, the HMP should explicitly set out that its activities will not be a barrier to pest control operations, including 1080 operations in the proposed area.
22. The HMP should set out how it was developed, will be interpreted, and administered to give effect to the principles of the Treaty of Waitangi.
23. The Key parties and relationships part should include an explanation regarding the relationship between the Minister of Conservation and the Minister of Hunting and Fishing.
24. This section should also set out who will be responsible for implementing the HMP. The HMP explains that the Minister has the power to delegate power to manage the HOSI to the Game Animal Council (GAC). The HMP goes on to say the GAC will work closely with the Fiordland Wapiti Foundation (FWF) and DOC on implementing the HMP. The HMP is extremely vague regarding who has ultimate responsibility. Similarly, the FWF responsibilities are vague. For transparency and accountability, the plan must clearly set out each organisation’s function and their responsibilities, including reporting.
25. The HMP fails to articulate and justify the benefits, particularly the public benefits of the HOSI. The Foreword sets out that there are proposed benefits of manging wapiti as a HOSI for the purpose of hunting and that the benefits will be set out in the Gazette notice. The HMP should contain a separate section that clearly articulates the expected benefits. Without stating what the expected benefits are, it is difficult to properly comment on the HMP objectives and strategies and whether they will achieve the expected benefits, as required by the GAC Act.

Values and context

26. While there is useful context in this section, this context is unnecessary in the HMP.
27. That said, the values and context section provides a reasonable description of the Fiordland National Park, including the Glaisnock Wilderness Area. However, a much greater focus on the importance of its ecological values in the context of the wilderness area and the WHA would enhance this section of the HMP as well as emphasise its international significance.
28. Ecological outcomes of the FWF efforts should be described. This would be more meaningful, rather than a description of their outputs.
29. Much of the information on the Fiordland wapiti herd and hunting and managing for hunting purposes is subjective. The area is used by other recreationalists who choose to enjoy Fiordland National Park for its unique natural features. If the values and context part is to be retained, then it should provide a description of other recreational uses occurring in the area e.g. tramping, climbing, bird watching, botanising, photography etc.
30. The ‘monitoring research and reporting to support management’ part does not belong in the values part of the HMP. This should be in its own part and better linked to the objectives and strategies.

Objectives

31. There are too many objectives set out in the HMP, and they are not fit for purpose. They are competing, where ecological objectives are ‘balanced’ with hunting objectives. They do not appear to be science based. This is misguided.
32. On the myth of ‘balancing’ objectives, a recent Newsroom article quoted Forest Ecologist Dr. Sean Husheer:
*“Anyone suggesting that there can be a balance between satisfactory hunting for recreational hunters and forest regeneration is ecologically illiterate.”*⁵
33. This statement aligns with the reality of introduced browsing pests in New Zealand’s forests, which is supported by a large body of scientific evidence on the impacts of ungulates on New Zealand’s native ecosystems.⁶
34. Research confirms that to restore browsed indigenous flora, introduced browsing animals must be maintained at very low levels or excluded all together. This is unlikely to align with an enhanced hunting experience.
35. The HMP lacks a SMART ecological goal – specific, measurable, achievable, relevant, and time bound – as a priority. Goal 3.7 sets out that monitoring will enable adaptive management and demonstrate whether the management of the Fiordland wapiti is achieving the objectives and strategies of the HMP. Fundamental to adaptive management is a SMART ecological goal – in other words, what the HMP is trying to achieve and by when.
36. Considering the proposed location for this HOSI is within Fiordland National Park, a wilderness area and a WHA with high conservation values, Forest & Bird recommends that the objectives are streamlined and include an overarching ecological goal as a priority.

Strategies

37. The strategies to achieve the objectives and the benefits of managing the HOSI for hunting purposes are vague. Strategy 3.10 discusses setting an annual control target, however there is no explanation of how this target will be set or enforced. The experience with Himalayan tahr and the failure to achieve control targets in Himalayan Tahr Control Plan 1993 give no confidence that control targets can be achieved.
38. In the absence of a SMART ecological goal in the HMP, which is fundamental to the success of any adaptive management approach, there is no way of knowing whether the annual control target will be appropriate. Even if it was appropriate, history shows that it is unlikely to be achieved.
39. The narrative around HOSI is that hunter led management does not come at a cost to the public. The HMP should clearly set out a strategy for recovering costs. 3.16 *‘seeks to charge a fee to hunt Fiordland wapiti’* to cover costs. This strategy provides no confidence that the costs will be recovered and not be borne by the public. In a Briefing to the Minister on the proposed wapiti HOSI, DOC explain that there is an expectation that they themselves will cover some of the costs:

HOSI would have financial implications for DOC. Of the \$457,000 estimated cost for HOSI management and monitoring in the proposal, the FWF proposes that DOC fund vegetation

⁵ <https://newsroom.co.nz/2025/11/19/deer-threat-in-national-park-debated-as-herd-status-advances/>

⁶ See Appendix 1. Research Reference List

monitoring (around \$40,000 per annum). We consider that these monitoring costs are likely to be higher. Final costs would be determined once the monitoring program has been confirmed. The deer removal operation costs are also likely to be higher than estimated. There is an expectation from FWF that the Crown also fund associated compliance, review, statutory, management and reporting processes and systems. While the overall costs appear reasonable, these matters represent areas for discussion and development during the statutory development process. DOC considers we will be able to fund HOSI operation costs proposed to be covered by DOC, via internal reprioritisation. The full financial implications for the Crown are likely to be higher and would need to be confirmed as part of the statutory process.⁷

40. Clearly there are significant public costs. Neither the supporting consultation document nor the HMP appear to contain a cost benefit analysis for the wapiti HOSI, to justify this approach over other methods for controlling wild animals. The HMP should set out clearly what the expected costs to the public are and which of the strategies DOC is expected to fund, to assist in determining the efficacy of the HOSI.
41. The strategies for monitoring set out in 3.19 are inadequate. Monitoring relies on a SMART ecological objective. The proposed methods have been assessed as unable to provide a definitive answer on the efficacy of current FWF activities to deliver on existing ecological outcomes.⁸ The original paper by Sweetapple Nugent (2010) discouraged the use of the seedling ratio index for assessing forest health. Forest & Bird expects at the very least, a robust monitoring framework tied to a SMART ecological goal. The HMP does not do this.
42. Regarding the proposed annual Operational Plan described at 3.36, this should set out who and what criteria determines the targets in the annual operational plan and how they will achieve the Objectives. The tahr experience shows that annual operational plans do not provide for the achieving of targets.
43. Similarly, with the annual report at 3.37, details regarding who is responsible for preparing this report and how the raw monitoring data will be shared for independent analysis should be described.
44. Forest & Bird strongly opposes Strategy 4.1. By deferring the setting of control targets to an 'Annual Operational Plan,' the public is excluded from any meaningful role. A statutory management plan must set robust environmental limits (e.g., maximum population density or specific vegetation recovery thresholds) with a time frame, within the HMP itself. In the absence of robust limits and a time frame, Forest & Bird has no confidence that this HMP will succeed. An operational annual plan should be open for public consultation, and the HMP must contain environment limits that the Annual Operational Plans must meet.
45. Without pre-defined 'bottom lines' in the HMP, the actual number of pests allowed in the Fiordland National Park 'wapiti area' will be decided annually behind closed doors, without the public scrutiny. This does not provide certainty, accountability, or credibility.

Compliance, review, and enforcement

46. The Compliance, review, and enforcement part lacks detail, particularly in the situation where the HMP fails. This part appears to only include and meaningful compliance and enforcement provisions, for where a person hunts or kills an animal in the designated area

⁷ <https://www.doc.govt.nz/globalassets/documents/about-doc/oia/2025/august/attachment-25-b-0190-wapiti-hosi-proposal.pdf> Paragraphs 10 -11

⁸ Whitehead et al. (2024) The effects of deer control on alpine plant browse in Fiordland National Park from 2006–2024. Manaaki Whenua Landcare Research. Contract Report: LC4545 prepared for the Department of Conservation.

for the HOSI without permission. There are no compliance and enforcement provisions for the HMP itself.

47. The HMP needs to set out the roles and responsibilities of all parties involved and a time frame for when responsibilities will be achieved. The HMP needs to set out which organisation has ultimate responsibility for enforcing compliance of the plan (including a SMART ecological objective) and the steps to be taken when the plan has not been complied with or its objectives have not been met within the specified time.
48. This part must also clearly set out that DOC retains the ability to carry out wild animal control operations, particularly where ecological objectives are not met. The inclusion of an overarching SMART ecological goal provides reference point for DOC to have the authority to take back control and ensure that the ecological goal is achieved.

Conclusion

49. Forest & Bird considers the wapiti herd of special interest herd management plan falls woefully short. The Society strongly opposes the designation of wapiti as a herd of special interest in Fiordland National Park. The focus instead, should be on co-ordinated collective action to deal with the devastating impacts that expanding populations of introduced wild animals are having on economic productivity and the environment.

Recommendation

50. We recommend that you do not designate wapiti as a herd of special interest in Fiordland National Park.
51. Thank you very much for the opportunity to provide feedback on the proposed Wapiti Herd of special interest herd management plan. We hope that you will find our feedback useful.
52. Forest & Bird wishes to be heard in support of our submission.

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*** Submission Ends***

Rosalie Snoyink

Submission Details

Eirwen Harris Mitchell

From: Rosalie Snoyink s9(2)(a)
Sent: Friday, 5 December 2025 2:43 pm
To: wapitiHOSIHMP
Subject: Wapiti HOSI Management Plan
Attachments: HOSI Submission R. Snoyink.docx

Categories: Green category

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

To the Department of Conservation
Christchurch.

Please see attached submission on the Wapiti HOSI proposal from:

Rosalie Snoyink

s9(2)(a)

s9(2)(a)

m. s9(2)(a)

Submission on Fiordland wapiti deer herd of special interest Draft Management Plan (the Plan).

To: The Department of Conservation (DOC)
Christchurch
Email: wapitihosihmp@doc.govt.nz

Date: 5 December 2025

Submitter: R.J. Snoyink

Thank you, I am pleased to have the opportunity to provide feedback on the Fiordland Wapiti HOSI Draft Management Plan. It does seem to me a step is missing though, as no opportunity has been given to the public to consult on this proposed Fiordland designation, within a National Park and a World Heritage Area. It is a giant leap from an idea to a Management Plan (the Plan). Therefore I take this opportunity to say I strongly support HOSI projects on private and low status public lands, NOT in National Parks where the effects of ungulate browsing will likely be irreversible.

My comments on the Plan are:

Section 2. Values and key context

Natural heritage and conservation values

I mostly support this section of the Plan which provides an accurate description of Fiordland's dramatic landscapes, rich indigenous biodiversity and its unique flora and fauna, so highly valued by the New Zealand public.

Conservation and introduced species

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

The statement *Intensive control, commercial wild animal recovery operations and community-led programmes have resulted in variable suppression of the deer population over time in Fiordland National Park* indicates to me a failed strategy to date in controlling deer numbers. (Recent media articles confirm this).

This section of the Plan claims the benefits of managing healthy game animals for hunting purposes while protecting indigenous biodiversity. I do not support this claim as the two are competing strategies. The ecological evidence suggests these two desired outcomes are incompatible. You can have a healthy herd, or a healthy regenerating forest, you can't have both.

Hunting and recreational values.

While I agree with the history of hunting wapiti in Fiordland as outlined in this section, I do not agree with objectives and strategies that focus on habitat health to improve animal quality and enhance the Fiordland wapiti hunting experience. I disagree with a strategy that

focuses on hunting experiences and outcomes, which includes improving herd genetics via selective targeting of Fiordland wapiti that have less wapiti-like traits, improving herd quality and promoting animal and trophy characteristics sought by hunters. I do not support National Parks being used for this purpose. No management should be delegated to Hunting Groups or the Game Animal Council within National Parks.

Monitoring, research and reporting to support management

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

Culture, heritage, community and stewardship values

While maintaining huts, participating in trapping projects, bird surveys, and removing chamois when sighted during deer control and recovery operations is recognised and acknowledged by the submitter, this effort in no way is a qualification for designating HOSI in Fiordland.

Section 3 Objectives and Strategies

The objectives are more about improving the hunting experience than protecting the environment. They are weak, unclear and unachievable. The objectives do not set out any benefits to the public who value National Parks as the very best examples of our scenery, landscapes and indigenous flora and fauna.

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

Outcome sought:

I urge the Minister for Hunting to reject the Fiordland HOSI application.

I wish to be heard in support of my submission.

R.J. Snoyink