

Fiordland Wapiti Herd of Special Interest

Draft Herd Management Plan

Submission Attachments - submitter last name Sp - U

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Walter Speck

Submission Details

Submission Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan

Supporting documents

Role of Hunting in New Zealand

Hunting is a fundamental human activity that supplies high-quality protein and supports physical and mental health. It also fosters responsibility toward people and nature; reliable hunters are responsible citizens.

In New Zealand, native huntable species are no longer available, so introduced species now fulfil this role and require effective management.

Organizations like the Wapiti Foundation, Game Animal Council, and both recreational and commercial hunters play key roles in developing a sustainable game and land management system for New Zealand. Past mistakes, such as eradication efforts and unstable population cycles, highlight the need for balanced, long-term strategies.

Role of Introduced Species in New Zealand

In New Zealand, introduced animal and plant species are essential to support and sustain the population. These species not only contribute to the country's food supply but also provide necessary resources for accommodation and overall well-being.

Challenges of Eradication Efforts

Attempts to eradicate introduced animals and plants are often rooted in ideology rather than practicality. Such initiatives are unrealistic and do not address the actual needs of the population. Furthermore, these eradication efforts represent a significant waste of time, effort, and financial resources, detracting from more effective management strategies.

Ines Stager

Submission Details

Eirwen Harris Mitchell

From: Ines Stäger [s9(2)(a)]
Sent: Sunday, 7 December 2025 3:53 pm
To: wapitiHOSIHMP
Subject: Submission wapiti HOSI
Attachments: Herds of special interest, Wapiti submission.docx
Categories: Green category

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

Please find attached my submission.

Ines Stäger, [s9(2)(a)], [s9(2)(a)]

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

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

Submitted via email: wapitihosihmp@doc.govt.nz

Geraldine 7. December 2025

Submission on the Wapiti Herd Management Plan

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

We have already lost considerable amounts of biodiversity values in our region due to ungulates roaming freely in public and private conservation areas. We have observed the damage by deer in the Peel Forest Scenic Reserve over the last 40 years. Deer have killed substantial lancewood trees (*Pseudopanax lanceolatus*), with a trunk diameter of 30+ cm. They have ring barked five finger (*Pseudopanax arboreus*). Once the five finger had gone, deer targeted Broadleaf (*Griselinia littoralis*). There is very little regrowth of mid canopy species, except for a few plants that appear unpalatable to deer. The understory is ferns with a few trees and literally no saplings that will grow to replace old trees of the forest because these are being eaten by ungulates. The interference of deer on our natural environment also affects native wildlife. Peel Forest Scenic Reserve is just one of many protected areas which are negatively affected by ungulates.

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

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

I have attached in this document some photos indicating the damage that we have observed.

Comments on the Management Plan

- The Plan lacks ecological objectives to achieve environmental protection. Ecological targets need to be set before a plan is finalised.
- Adaptive management will not work without clear ecological objectives and strategies.
- The strategy is very vague, due to the absence of an operational plan.

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

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



PFSR deer ringbarking trees 2009



Tasman Smith Scenic Reserve, no understorey, eaten out by deer and wallabies

Ron Stilwell

Submission Details

Eirwen Harris Mitchell

From: Ruth Stilwell s9(2)(a)
Sent: Sunday, 7 December 2025 2:50 pm
To: wapitiHOSIHMP
Subject: Wapiti Herd Management Plan - Submission

Categories: Green category

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

I support the Wapiti Herd Management Plan and the HOSI Status; but believe amendments are needed for this plan to work. It needs to be efficient and effective, and not killed with costs to the Fiordland Wapiti Foundation.

The Wapiti Herd in Fiordland is very unique to NZ, not just the animals themselves, but the location where they are hunted. This is shown in the number of hunters applying for hunting ballots, and hunters travelling from overseas to hunt there. Wapiti are a drawcard for their trophy status. They are the catalyst to draw hunters and party members into Fiordland for their chance to experience the thrill of the hunt, and test out wet weather gear.

Wapiti have now been here over 120 years as part of our history. Wapiti are still known by their true North American name, and are a special part of our biodiversity. They have been here longer than a large percentage of humans in NZ, and are less destructive.

It is a special privilege for NZ to have a managed herd of Wapiti in Fiordland. Outside the hunting season, trampers have a chance to view Wapiti in their natural habitat.

Most hunters love their surrounds, the bush, rivers etc and that is a big part of getting out there. With that, comes the fact that animal numbers need to be monitored. This is best done by Wapiti Foundation members and with an effort to keeping the Wapiti herd pure, most management should be focussed on Red Deer.

To implement monitoring and management of vegetation impacts, this should be done by the Fiordland Wapiti Foundation and people who understand the natural movement of wild animals, where animals move down in winter, then up in summer/autumn. This puts different grazing pressures on areas at different times.

With regard to management of the Fiordland Wapiti area I see an opportunity which could be explored, where we have approx. 500 hunters, who with a small amount of instruction could take in and lay rat and mouse poison. Many poisons are for sale to the public e.g. bromadiolone blocks which can handle wet weather and are safer than anticoagulants.

Conclusion: The Wapiti HOSI is a great move for the Wapiti Herd management, but also the management of their habitat.

Ron Stilwell

s9(2)(a)
mobile s9(2)(a)

Andrew Stroud

Submission Details

Eirwen Harris Mitchell

From: sikaHOSIHMP
Sent: Wednesday, 17 December 2025 4:29 pm
To: wapitiHOSIHMP
Subject: Please Reconsider Deer Protection Proposal

From: sikaHOSIHMP <sikaHOSIHMP@doc.govt.nz>
Sent: Wednesday, 17 December 2025 4:27 pm
To: sikaHOSIHMP <sikaHOSIHMP@doc.govt.nz>
Subject: Please Reconsider Deer Protection Proposal

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

Kia ora Minister Potaka,

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

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

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

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

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

It is not too late to make the right decision.

We ignored conservation experts when stoats were introduced, and the consequences have been catastrophic. We are warning you again: **do not provide legal protection for deer on conservation**

land. The ecological collapse visible across Fiordland—dead canopies, browsed-out understories, drying forests—will only accelerate.

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

Ngā mihi,

Andrew Stroud

s9(2)(a)

Richard Suggate

Submission Details

Fiordland Wapiti Herd of Special Interest - Draft Herd Management Plan

Submission by Richard Suggate

Fiordland Wapiti Herd of Special Interest - Draft Herd Management Plan

I oppose the introduction of this Plan because I oppose the introduction of a HOSI into the Fiordland National Park. I also consider that the plan has conflicting objectives and lacks a scientific basis for trying to achieve the incompatible improvement of herd quality and hunting experience and robust ecological outcomes. It is essentially a 'suck it and see' piece of 'adaptive management' to achieve political objectives. The Plan does not meet the test of the over-riding considerations and will be an expensive experiment in attempting to meet multiple conflicting objectives. The South-West NZ Te Wāhi Pounamu World Heritage Area will also be degraded by this new status for part of the Fiordland National Park.

1. Introduction

Over-riding considerations:

The draft plan only partially satisfies the over-riding considerations. Because it cannot demonstrate that it will achieve the protection of indigenous biodiversity it does not provide for the "*welfare and management of public conservation land and resources generally*".

The General Policy for National Parks 2005 Section "4.3(c) National park biosecurity and pest management should: i) seek to maximise outcomes for the benefit of indigenous species, habitats and ecosystems".

The draft plan does not demonstrate that this will be achieved.

The Fiordland National Park Management Plan 2007

Part 3: Te Wahipounamu – South West New Zealand World Heritage Area Objective 1. To maintain the ecological and landscape integrity of the Te Wāhipounamu – South West New Zealand World Heritage Area. The draft plan fails to demonstrate it will maintain the ecological integrity of the Park.

4.5 Introduced Animals

The draft plan fails to demonstrate that it meets the following two objectives.

Objectives 1. To preserve those areas of high natural biodiversity values in Fiordland National Park most at risk from introduced animals. 2. To reduce and control introduced animal numbers by all available means to a level that allows for the regeneration of browsed indigenous flora and the recovery of predated fauna. Initial emphasis will be placed on identified priority areas and species.

2. Values and key context

“The Wapiti Area does not contain any ecological management areas or units that have been identified by the Department’s existing statutory management plans.”

The Plan has been prepared in the absence of any detailed information on what rare and endangered plant species are present in the area and what impact deer and wapiti browsing are having on them. There is no information on whether by selectively increasing the moose-like traits of the wapiti, damage to indigenous species will be increased or decreased.

The following section from the draft plan clearly outlines how deer browsing alters the alpine and forest composition over time and that selectively targeted native plants may be taken out of the ecosystem. It is unclear with the monitoring proposed that this threat will be prevented or mitigated.

“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.”

The draft Plan repeatedly outlines how the objectives and strategies in the plan will be driven by hunting purposes as illustrated in this quote below. Generalised intentions of meeting conservation outcomes do not meet the strict requirements of the National Parks Act. The Plan is bound to be tested in Court and lacks a robust scientific justification for its intentions.

“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.”

3. Objectives and Strategies

Some of the draft Plan Objectives as individual statements have merit. I support Objective One. Unfortunately Objectives 1-3 are incompatible. The Plan appears to be hoping that by ‘adaptive management’ that Objective 1 will be met while achieving Objective 2. Objective 3 will put a commercial emphasis on the management of the area and income generation may well lead to herd management actions that are detrimental to indigenous species. Furthermore, the Plan does not contain any

references to research that can demonstrate which palatable species are more or less vulnerable to browsing, particularly those that are rare and endangered.

Objectives

1. *“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. *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. *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.”*

3.1 Strategies

The Strategies have a very significant omission. There is no Strategy to implement Objective One. Is this because the Department does not know how to achieve this or is it because only hunting strategies are of importance? While there are Monitoring Objectives and Strategy it is unclear how the Plan will “restore ecological processes and communities of browsed indigenous flora and prevent the loss of indigenous species from their current range.”

Commercial recovery and professional control operations

I strongly support these two strategies below. It is good to see that the Department recognises that hunting effort alone will not reduce the wapiti/deer herd to numbers that are compatible with restoring ecological processes and preventing the loss of species. However, I am concerned that the revenue generation may be incompatible with minimising herd numbers and that the Department will have to significantly increase its budget contributions to pay for control, monitoring and research.

“1.9 (b) Focus professional control operations on difficult-to-access areas where recreational hunting and commercial recovery operations cannot meet control targets, or doing so is not commercially viable.

1.9 (c) Seek to meet professional control operation costs through fees, sponsorship and other commercial partnerships associated with the Fiordland Wapiti Herd of Special Interest.”

There is no Monitoring Strategy to identify changes in plant species that are most vulnerable to browsing or potential extinction. There is no Research Strategy to study the effects of the deer browsing on forest composition or individual species.

4. Compliance, Review and Enforcement

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. The Review will also consider whether the Plan is delivering on Objective One not just hunting purposes. See Monitoring strategy 2.3 and Research strategy 2.6.

5. Wapiti Population estimates and plant monitoring data.

Appendix One below contains excerpts from the Consultation Support Document and the report by the Department to the Select Committee on the GAC HOSI Amendment Bill.

It is clear that there is no accurate way of estimating total wapiti numbers and number of deer taken annually by hunters. There is no robust population management plan and it is unclear whether one will be developed. Given that this HOSI will cause ongoing policy debate, it would seem to be in the best interests of management to commission research on developing an accurate population model. If that is impossible to achieve with the inability to survey population numbers and pellet counts cannot be calibrated against deer numbers, the plan will then become dependent on strong outcome monitoring. Is herd health, trophy heads and age/sex composition going to be the main indicator for success of 'hunting purposes' ?

While current monitoring indicates a slight reduction in alpine browsing and forest seedling regeneration it is hoped that the improved ecological monitoring techniques (Strategy 2.1 and 2.2) will demonstrate further improvement. However, there is no outcome statement on what constitutes restored ecological processes and loss of species range. There needs to be more focus on rare, endangered and vulnerable species numbers and range.

Appendix One

Fiordland Wapiti Herd of Special Interest - Herd management plan consultation support document

Q. How many wapiti are there in Fiordland? What is the best estimate the Department can give?

The Department does not count the exact number of wild animals present in an area. Wild animal populations are mostly monitored by carrying out faecal pellet counts (providing an index of abundance) and calculating removal rates. Both methods are inexact. Monitoring and reported removals by the Fiordland Wapiti Foundation suggest that there are thousands rather than tens of thousands of deer in the Wapiti Area.

Q. Why doesn't the Plan set out a target animal density for the Wapiti Area?

Effective population management focuses on whether the ecological objectives are being achieved. Determining animal density in the rugged terrain of the Wapiti Area is difficult, expensive and imprecise, and these animals are liable to continuously move throughout the area. The correlation between deer density and the level of browse is also difficult to quantify and depends on several factors, including herd composition and demographics (age, weight and sex) and the characteristics of the plant community (density and presence of more palatable or less palatable species). Therefore, it is not desirable to fix set density targets.

Q. Recreational hunters can contribute to managing populations, so why does the Plan mention professional animal control?

Estimated that 900–1,100 deer are taken from the Wapiti Area annually

Hunting deer in the remote and rugged terrain of Fiordland National Park is challenging. Records of deer removed directly by recreational hunters are currently only submitted during the ballot period (mid-March to late April). Numbers reported usually amount to less than 100, with hunters encouraged to leave the management of deer numbers up to the Wapiti Foundation. The Department does not have data on the number of animals removed by recreational hunters outside the ballot period. However, recreational hunting alone is not enough to control deer numbers in the Wapiti Area.

Game Animal Council (Herds of Special Interest) Amendment Bill Report of the Department of Conservation to the Environment Committee

Appendix A: Advice requested by the Environment Committee

What are the impacts of Fiordland wapiti on forest health and structure and ecological values in Fiordland National Park in the area where a HOSI is being proposed?

1.

Wapiti deer feed on forest plants that they can reach. They are picky eaters and prefer some plant species over others. They will seek out those plants they prefer resulting in higher impact on those species.

2.

This selective browsing by wild animals is known to change the structure and composition of forests in New Zealand. In forests, leafy understorey plants like lancewood, five-finger and broadleaf are amongst the most preferred and therefore impacted.

3.

Preferred plants usually have leaves that are large and soft, have a high nutrient content, are low in fibre, and contain low amounts of aromatic chemicals that smell

or taste bitter or peppery. They are often fast-growing plants that are important for healing a forest after disturbance, stabilising slopes and preventing erosion. This can reduce a forest's resilience to storm damage and the effects of climate change. Their soft leaves also break down quickly, returning nutrients to the system. Some have berries and are important food sources for native animals, and others create shelter and shade for native snails and other invertebrates.

4.

Since 2010, DOC has undertaken forest browser impact monitoring in Fiordland National Park, including the Wapiti area - the details are described below.

What do the [monitoring] results show?

10.

Monitoring in alpine areas focuses on browse levels of three herb species preferred by deer. Over the 18-year duration of the program, browse levels have fluctuated; between 2014 and 2017 browse levels averaged 17%. In 2019, DOC reviewed the monitoring data and established a target of less than 10% of monitored plants showing signs of browse—based on the hypothesis that this threshold would reduce deer impacts to acceptable levels. In 2024, the proportion of browsed plants in the Wapiti area had significantly declined to 8%, meeting the newly established target. In unmanaged areas outside the Wapiti area, browse increased from 10% in 2016-2018 to 16% in 2022.

11.

In forest catchments, DOC monitors the ratio of seedlings to saplings for deer-preferred species (Seedling Ratio Index or SRI method). A positive ratio indicates successful regeneration, while a negative ratio suggests regeneration is being impeded. Over the 12-year monitoring period, the ratio has remained slightly negative, though it has improved from -0.25 to -0.1, indicating a positive trend in seedling regeneration. In contrast, adjacent unmanaged forest areas outside the Wapiti area continue to show a stable and strongly negative ratio of -0.5.

12.

Overall, recent vegetation monitoring results in the Wapiti area indicate a reduction in deer browse impacts in alpine areas and signs of improving regeneration in forested catchments. While the alpine browse target has been achieved, continued progress toward a positive seedling-to-sapling ratio in forest areas remains a key objective.

Benjamin Swale

Submission Details

Eirwen Harris Mitchell

From: Benjamin Swale s9(2)(a)
Sent: Monday, 8 December 2025 10:10 pm
To: wapitiHOSIHMP
Subject: Attn: Wapiti HOSI draft HMP Submissions
Attachments: Greenwashing instructions.pdf

Categories: Green category

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

Please find my submission on the Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan below:

Feedback on Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan

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

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

This Plan should not go ahead, and the Government should fund DOC properly. The entire deer population (which do not even sound as if they are wapiti at all - just mongrel red deer-wapiti crosses - though the forest does not care what it is being degraded by - and it is probably as enjoyable to kill these as the real thing, truth be known) should be exterminated through as humane means as possible.

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

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

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

Benjamin Swale

Note: I made this submission above using the automated process. Despite following the instructions, it appears that my submission was not in fact successful. I suspect that many people's submissions will have also been unrecorded. I would like to think this was an error rather than a deliberate ploy to reduce public scrutiny.

From: keystone@objective.com <keystone@objective.com>

Sent: Monday, 8 December 2025 8:19 pm

To: s9(2)(a)

Subject: Your response to Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan has been saved

Dear Benjamin Swale,

Thank you for your interest in Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan.

Please note that your response has been saved as a draft but not yet submitted to Department of Conservation NZ.

To add additional comments or submit your response, click on the link below:

<https://www.consultations.doc.govt.nz/kpse/event/2295233C-AF57-4CD3-85CC-1CE490FA4FD9/submission/E4A6E6FA-F1E4-4672-AEB7-22B13C48D531>

If the link appears to be broken, please try copying the entire link into the address bar of your web browser.

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GREENWASH INSTRUCTIONS



PRETEND TO BE
SUSTAINABLE



MANIPULATE



DISTRACT FROM
EXPLOITATION OF
PEOPLE & PLANET



LOW PRICES
PAID FOR
BY THE
PLANET

4 TONS OF
CLOTHING
WASTED EVERY
SECOND

WE THROW
AWAY
250 TONS
OF CLOTHES
PER DAY

LOW
PRICES
HIGH
SEA
LEVELS

REPARER
MEER
KOOP
MINDER

COOL PRICES
→ HOT CLIMATE

Larry Tasker

Submission Details

Eirwen Harris Mitchell

From: Larry Tasker s9(2)(a)
Sent: Sunday, 7 December 2025 3:43 pm
To: wapitiHOSIHMP
Subject: Government plan to give protection to deer

Categories: Green category

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To Whom it may concern

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

Larry Tasker

s9(2)(a)

Sherryn Temara

Submission Details

Eirwen Harris Mitchell

From: Sherryn Temara s9(2)(a)
Sent: Monday, 8 December 2025 8:53 am
To: wapitiHOSIHMP
Cc: SikaHerdofSpecialInterest@doc.govt.nz
Subject: Sika and Wapiti deer

Categories: Green category

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Sherryn Temara

s9(2)(a)

s9(2)(a)

My father would be appalled, (culled deer and a deer hunter in his lifetime)as am I, that this NZ government has considered this to happen.

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 areas.

Ngā mihi nui. 🌱

Karla Thurlow

Submission Details

Eirwen Harris Mitchell

From: Karla Thurlow s9(2)(a)
Sent: Monday, 8 December 2025 10:48 am
To: wapitiHOSIHMP; sikaherdofspecialinterest@doc.govt.nz
Subject: Submission re deer - legal protection

Categories: Green category

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Karla Thurlow

s9(2)(a)

s9(2)(a)

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

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

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

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- 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. 🌱

Gwyn Thurlow - New Zealand Deerstalkers Association

Submission Details

Eirwen Harris Mitchell

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

Categories: Green category

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

Dear DOC,

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

Kind regards
Gwyn

Gwyn Thurlow
Chief Executive Officer and General Counsel



3 Collina Terrace, Thorndon, Wellington 6011

P: +64 [REDACTED]

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E: [REDACTED]

New Zealand Deerstalkers Association Inc
Est. 1937
www.deerstalkers.org.nz

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NZDA

New Zealand Deerstalkers Association

NZDA Written Submission

on

Draft Herd Management Plans

regarding

Herds of Special Interest for Sika and Wapiti

8 December 2025

Photo Credit: Jonathan Brown "Wapiti Cow in the mist"

To: Department of Conservation, HOSI team

Attention:

Sika HOSI Draft HMP Submissions

Wapiti HOSI Draft HMP Submissions

C/- Department of Conservation

PO Box 4715

Christchurch 8140

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

cc: Game Animal Council

Date: 8 December 2025

Prepared by: Gwyn Thurlow, Chief Executive and General Counsel

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INTRODUCTION

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

NZDA submits jointly on both draft plans:

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

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

BACKGROUND TO NZDA

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

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

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

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

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

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

OVERALL POSITION ON SIKA AND WAPITI HERDS OF SPECIAL INTEREST

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

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

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

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

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

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

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

Our submission is that both plans need an additional object:

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

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

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

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

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

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

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

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

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

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

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

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

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

3. How to Manage to Protect and Enhance Specialness

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

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

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

4. Adaptive Management and Review

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

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

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

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

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

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

What Strategy Should be Adopted?

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

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

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

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

Gathering and tracking hunter data is essential and missing.

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

Submission 2: Funding and Delivery of Herds of Special Interest

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

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

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

Why Funding Must Be Directly Allocated to Foundations

Hunter-led Foundations and equivalent organisations:

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

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

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

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

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

Direct funding to Foundations is essential because it:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Submission 3. Other Matters on the Draft Plans

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

1. Guarding Against HOSI Becoming Default Policy for All Deer

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

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

The plans should clearly distinguish between:

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

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

3. Protection From Policy Drift Over Time

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

4. Certainty Around Hunting Access and Fairness

The plans should explicitly affirm that:

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

Perceived inequity in access will undermine hunter support and stewardship.

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

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

6. Protecting Hunter Social Licence

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

7. Transparency Around Success and Failure

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

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

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

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

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

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

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

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

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

Instead, plans should focus on:

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

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

Hamish Turnbull

Submission Details

Eirwen Harris Mitchell

From: Hamish Turnbull s9(2)(a)
Sent: Monday, 8 December 2025 1:26 pm
To: wapitiHOSIHMP; SikaHerdOfSpecialInterest@doc.govt.nz
Subject: Submission on the Draft Wapoti Herd of Special Interest (HOSI) Management Plan
And my Submission on the Draft Sika Herd of Special Interest (HOSI) Management Plan.

Categories: Green category

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

To whom this may concern,

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. 🌱

Hamish

Matthias Turner

Submission Details

Eirwen Harris Mitchell

From: Matty [REDACTED]
Sent: Friday, 5 December 2025 3:53 pm
To: wapitiHOSIHMP
Subject: Submission on the Fiordland Wapiti HOSI Herd Management Plan

Categories: Green category

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

Hey Team,

Thank you for the opportunity to submit on the proposed Fiordland Wapiti Herd of Special Interest (HOSI) Management Plan. I am writing as an individual who cares deeply about the future of the Fiordland Wapiti herd and the unique hunting, heritage, and environmental values it represents.

1. My position

I support the Herd Management Plan in principle, but I believe several amendments are essential to ensure it works effectively for both the Fiordland Wapiti herd and the Fiordland ecosystem.

2. Why I value the Fiordland Wapiti herd

For me, Wapiti in Fiordland represent something incredibly special. It is the heritage, the story of the herd, and the rugged adventure that comes with hunting in such a wild and untouched landscape.

It is also the challenge, the connection to nature, the mental and physical reset that Fiordland provides, and the uniqueness of a true Wapiti trophy. Beyond that, it is about legacy. It is about being able to share these places and experiences with family in the years to come.

A Herd Management Plan under HOSI needs to reflect and protect these values.

3. Social and community outcomes

I believe the Plan should clearly support a hunter led, community driven management model. The Fiordland Wapiti herd has always had strong community involvement, and the Plan should reinforce that by ensuring positive social and economic outcomes for local communities and volunteers.

4. Funding

All funding for the Wapiti Herd of Special Interest should be sent directly from the funding source to the implementing end user. In this case it should be the Fiordland Wapiti Foundation. Funding should not be routed through DOC, GAC or any government agency where it could be redistributed or delayed.

5. Financial reporting

Financial reporting requirements should not be included within the Herd Management Plan. These obligations create unnecessary administrative burden and they do not contribute to the practical management of the herd.

6. Operational plan

The operational plan needs to remain a separate, flexible tool that enables innovation. The HOSI model is a real opportunity to continue improving deer management techniques in New Zealand and to build on what has already been successful.

This document must be developed by the group that is actually implementing the HOSI. In this case it must be the Fiordland Wapiti Foundation. It needs the freedom to adapt as conditions change and as new insights emerge.

7. Vegetation monitoring

Monitoring is important, but it must be efficient, effective and aligned with adaptive management principles.

It should directly relate to the objectives in the Plan and avoid unnecessary cost or bureaucracy. Monitoring should focus only on the actual impact deer have on the environment. Faecal pellet counts should not be included. They are subjective and they do not provide meaningful information about the true environmental impact.

8. Roles and responsibilities

Delegations should sit with the people who have the proven skills required to carry them out. The Fiordland Wapiti Foundation has demonstrated for more than two decades that they have the expertise, systems and passion required to successfully implement the HOSI and operational plans.

There must also be clear clarification on whether the HOSI sits under DOC legislation or GAC legislation.

9. Setting the right tone for the HOSI

A Wapiti HOSI is about active management and not control. I strongly believe the language of the Plan should reflect that. All references to the term control should be removed and replaced with the word management. This more accurately reflects the intent of the Plan and the collaborative approach that has proven successful.

The old control narrative reflects outdated thinking that has not worked for New Zealand’s deer management in the past. This Plan should set a modern, constructive and forward thinking tone.

Thank you for considering my submission. I care a lot about the future of the Fiordland Wapiti herd and I appreciate the opportunity to have a voice in shaping how it will be managed.

Regards,

Matthias Turner



Matty [redacted]
[redacted]

Patrick Turner

Submission Details

Eirwen Harris Mitchell

From: Patrick Turner [s9(2)(a)]
Sent: Monday, 8 December 2025 8:30 pm
To: wapitiHOSIHMP
Subject: Herds of Special Interest Submission

Categories: Green category

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

Patrick Turner [s9(2)(a)]

[s9(2)(a)]

[s9(2)(a)] To whom this may concern

I am a long-standing recreational hunter with extensive on-the-ground experience across Fiordland, a member of the New Zealand Deerstalkers Association (NZDA), Vice-President of the North Canterbury NZDA branch (second largest NZDA branch in NZ), and an active supporter of the Fiordland Wapiti Foundation (FWF). I have taken part in the Wapiti ballot system, and am directly invested in the continuation and enhancement of hunter-led management.

Overall Position

I **strongly and unequivocally support** the Draft Herd Management Plan (the Plan) to designate the Fiordland wapiti herd as a Herd of Special Interest (HOSI) under the Game Animal Council Act 2013. The Plan represents the most credible, proven and balanced approach to ensuring Fiordland's ecosystems are protected **while maintaining one of New Zealand's most iconic and culturally significant hunting resources**.

For nearly two decades, the Fiordland Wapiti Foundation—supported by thousands of volunteer hunters—has delivered conservation outcomes that DOC alone could not have achieved at the same scale or cost. Over **18,000 unwanted deer removed**, unprecedented volunteer effort, and tangible biodiversity gains demonstrate that **hunter-led management is not only effective—it is essential**.

The HOSI framework simply formalises what has already been proven: **hunters are DOC's most reliable, motivated, and cost-effective conservation partners in Fiordland**.

Key Reasons for Support

1. Stronger, Healthier Wapiti Herds and Exceptional Hunting Opportunities

The Plan's herd objectives—maintaining a favourable sex ratio, ensuring a higher proportion of mature bulls, protecting genetic integrity, and minimising hybridisation—are all achievable only through a hunter-led approach. These objectives directly safeguard:

- the world-class trophy quality Fiordland is renowned for
- fair and equitable access via the ballot and block system
- the traditional hunting values that drive responsible stewardship

Fiordland wapiti hunting is internationally unique, especially during the bugle period. The Plan ensures this experience is not only preserved but **enhanced**, by continuing the highly successful block system that allocates opportunities to ~600 hunters annually and prevents overcrowding or overharvesting.

This is entirely consistent with NZDA’s long-standing advocacy for **science-based, sustainable management led by those who value the herd the most: hunters themselves**.

2. Hunter-Led Management Is the Gold Standard — and the Plan Strengthens It

The Fiordland Wapiti Foundation’s model sets a national benchmark for hunter-driven conservation. Hunters are not passive users; they are the **primary workforce and funders** for wapiti management and broader ecosystem protection.

The Plan builds on this by confirming FWF’s leadership role in:

- harvest and monitoring coordination
- hunter education and reporting
- commercial recovery oversight
- biodiversity and predator-control programmes
- research partnerships with DOC, GAC, and iwi

Hunters collectively contribute **over 40,000 hours per year** in Fiordland. No other group invests anywhere near this level of practical, on-the-ground conservation effort. The HOSI designation recognises this reality and finally gives hunters the structure and authority they have earned.

NZDA has advocated for this model for years, including supporting the Herds of Special Interest legislative amendments that made it possible. The Plan is a direct outcome of that vision.

3. Proven Conservation Success — Achieved *Because of* Hunters, Not In Spite of Them

Opposition to wapiti often relies on outdated assumptions. The last 20 years of FWF and hunter involvement prove unequivocally that **managed wapiti herds and thriving native ecosystems can—and do—coexist**.

Through targeted removal of 900–1,100 animals annually, strategic suppression in sensitive areas, and sophisticated monitoring (seedling ratios, pellet counts, permanent plots), the Plan prioritises ecological health while acknowledging the realities of Fiordland’s terrain and climate.

Key facts:

- Eradication is neither feasible nor effective in Fiordland’s vast, remote landscapes.
- Controlled hunter-led management is the only sustainable, scalable solution.
- Volunteer hunters have already driven major biodiversity gains, including protecting whio and takahē habitat.

FWF’s track record is exceptional, and the Plan expands their ability to deliver even more.

4. Significant Economic, Cultural, and Social Benefits

Wapiti management is almost entirely **self-funding**, powered by hunters—not taxpayers. The economic contribution of wapiti hunting exceeds \$1.3 million annually through local spending, with a further ~\$500,000 from wild animal recovery operations.

This model strengthens:

- local job creation
- regional tourism
- Fiordland community cohesion
- investment in conservation infrastructure

The Plan also supports genuine partnership with Ngāi Tahu, explicitly incorporating mātauranga Māori and a shared desire for sustainable use of the land.

This is the exact “community partnership” model NZDA has long championed as the future of conservation in New Zealand.

5. The Plan Already Addresses Ecological Concerns — and Gives DOC More Flexibility, Not Less

The adaptive management framework, with annual operational plans and five-year reviews, ensures that management can be tightened or relaxed as new science emerges. The Plan:

- prioritises takahē and other taonga species
- integrates red deer and chamois control
- responds to environmental uncertainties
- focuses on outcomes rather than arbitrary density targets

This approach is pragmatic, science-aligned, and grounded in extensive field data. It is the **opposite** of the inflexible, one-size-fits-all approaches that have failed in other regions.

Recommendations

- **Adopt the Plan exactly as drafted**, with strong delegations to the Game Animal Council and FWF.
- **Formally recognise hunters**, including NZDA and FWF members, as core partners in Fiordland conservation.
- **Report annual results publicly** to continue building trust and highlighting the substantial conservation work hunters deliver.
- Maintain robust feedback loops so hunters’ practical knowledge informs ongoing improvements.

Conclusion

This Plan is the most forward-thinking, cost-effective, and environmentally responsible path for Fiordland. It protects biodiversity, strengthens partnerships with hunters and iwi, ensures continued high-quality hunting opportunities, and builds on more than a decade of proven success.

Hunter-led management works.

The FWF model works.

Designating Fiordland wapiti as a Herd of Special Interest is the right decision for conservation, for community, and for the future of hunting in New Zealand.

I strongly urge the Minister for Hunting and Fishing to approve the designation and Plan without delay.

Thank you for considering my submission. I am available for further discussion.

Sincerely,

Patrick Turner

Simon Upton - Parliamentary Commissioner for the Environment

Submission Details



Feedback on the Draft Herd Management Plan for proposed Fiordland Wapiti Herd of Special Interest

8 December 2025

To Department of Conservation

Submitter details

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

My contact details are:

Phone: s9(2)(a)

Email: s9(2)(a)

Parliamentary Commissioner for the Environment

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

Submission

I will keep my comments on the Draft Herd Management Plan for designation of a Fiordland Wapiti Herd of Special Interest (HOSI) brief.

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

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

I would make the following observations about the consultation document:

- I would have expected a document that was much clearer about the terms of what is proposed. Large tracts of text are devoted to recounting history and the roles of various parties. The hard facts of what has happened to the wapiti population and indigenous biodiversity are missing, as are the actual known impacts of control efforts. We are told that the Fiordland Wapiti Foundation's work amounts to 'relatively consistent levels of management since 2005' while DOC's efforts are euphemistically described having been 'variable over time'.
- This document is filled with vague language. It sets out "an approach". It aims to generate **sufficient** revenue; it **seeks** to recover costs from the hunting community; it **seeks**

opportunities to undertake or support research; it **seeks** to “develop partnerships and commercial opportunities associated with Fiordland wapiti to help meet the costs of implementing this Plan”. There is a lot of ‘seeking’ going on in this plan and yet there is also almost no ambition about what it seeks to achieve.

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

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

Finally, I note that the Game Animal Council Amendment Bill is yet to be passed into law. I share the view of the New Zealand Conservation Authority (NZCA) in its submission, that publishing this draft plan is premature.¹ It assumes Parliament’s decision.

I also question whether using the HOSI mechanism, should it pass into law, is the best way forward. Under the National Parks Act 1980, the Conservation Authority has some discretion on whether to manage or exterminate introduced animals.² As far as I am aware, no such dispensation has been sought from the Conservation Authority. Seeking a determination from the NZCA may offer a simpler way forward within the existing system (i.e. without legislative change), and one that preserves the prioritisation of conservation.



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

¹ NZCA submission, <https://www.doc.govt.nz/about-us/statutory-and-advisory-bodies/nz-conservation-authority/submissions/submission-on-the-draft-fiordland-wapiti-herd-management-plan/>

² National Parks Act (1980, s4(2)(b)) states: “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.”

Liam Urquhart

Submission Details

Eirwen Harris Mitchell

From: Liam Urquhart s9(2)(a)
Sent: Sunday, 7 December 2025 9:19 pm
To: wapitiHOSIHMP
Subject: Submission on the Draft Wapoti Herd of Special Interest (HOSI) Management Plan

Categories: Green category

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

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

Ngā mihi nui.
Liam Urquhart