



Fiordland Wapiti Herd of Special Interest, Draft Herd Management Plan

Summary of Submissions



Department of
Conservation
Te Papa Atawhai

**Te Kāwanatanga
o Aotearoa**
New Zealand Government

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

Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan

– Summary of Submissions

Crown copyright © March 2026

This document is available at [Wapiti deer proposal for a Herd of Special Interest](#)

ISBN: 978-1-0671400-2-1

Published by:

Department of Conservation Te Papa Atawhai PB Box
10420, Wellington 6140
New Zealand



This work is licensed under the Creative Commons Attribution 4.0 International licence. In essence, you are free to copy, distribute and adapt the work, as long as you attribute the work to the Crown and abide by the other licence terms. To view a copy of this licence, visit creativecommons.org/licenses/by/4.0.

Please note that no departmental or governmental emblem, logo or Coat of Arms may be used in any way that infringes any provision of the Flags, Emblems, and Names Protection Act 1981. Use the wording 'Department of Conservation' in your attribution, not the Department of Conservation logo.

Disclaimer

While every effort has been made to ensure the information in this report is accurate, Department of Conservation does not accept any responsibility or liability for error of fact, omission, interpretation or opinion that may be present, nor for the consequences of any decisions based on this information. This report incorporates summaries generated using Microsoft Copilot, a generative AI tool. All AI-generated content was manually reviewed and verified by the Departmental staff to ensure accuracy and relevance.

Contents

Executive Summary	3
Background and key context.....	4
The public consultation and submissions process	5
What we heard	7

Executive Summary

The purpose of this document is to provide a high-level summary of the submissions received during public consultation on the Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan.

It includes submissions made online, and those emailed or posed to the Department of Conservation and Minister for Hunting and Fishing.

The submissions period ran from Monday 10 November 2025 until Monday 8 December 2025.

A total of 352 submissions were received.

This report is a summary of submissions only and does not provide an analysis or recommendations. Recommendations in response to submissions will be made through to the Minister for Hunting and Fishing.

A full record of submissions can be accessed through the Department of Conservation [Fiordland Wapiti Herd of Special Interest process webpage](#). Personal and private contact information has been redacted from submissions, in line with Department of Conservation policy.

Background and key context

In April 2025, the Minister for Hunting and Fishing (the Minister) received a proposal from the Fiordland Wapiti Foundation (the Foundation) to formally designate Fiordland wapiti as a Herd of Special Interest in part of Fiordland National Park.

The proposal was endorsed by the New Zealand Game Animal Council (the Game Animal Council), a statutory body established by the Game Animal Council Act 2013 with a range of functions in relation to game animals (deer, tahr, chamois and wild pigs).

The Minister agreed to initiate the statutory process to consider designating a Herd of Special Interest for Fiordland wapiti and tasked the Department to undertake the process and develop a draft herd management plan. This has involved targeted consultation and engagement with Treaty partners and statutory stakeholders - including the Ministry for Primary Industries, Game Animal Council, Department of Conservation, New Zealand Conservation Authority and relevant regional councils and conservation boards.

Development of the draft Herd Management Plan, and the associated public process, is only part of this wider process undertaken by the Minister to consider designating Fiordland wapiti in part of Fiordland National Park as a Herd of Special Interest.

Further information on the Fiordland wapiti HOSI process is available on the Department webpage [Wapiti deer proposal for a Herd of Special Interest](#).

A similar process is also underway to consider designating sika in the Kaimanawa and Kaweka Forest Parks and Kaweka Conservation Area as a Herd of Special Interest. As part of that process, a Sika Herd of Special Interest Draft Herd Management Plan was also released and open for public submissions between 10 November and 8 December 2025. More information on the process is available at [Sika deer proposal for a Herd of Special Interest](#).

Following publication of this report, the draft Plan will be revised to reflect the submission process, ongoing conversations with Treaty partners and any follow-up engagement undertaken with statutory stakeholders as appropriate.

The revised Plan and a range of supporting materials will be provided to the Minister, who will decide whether to finalise the Plan and designate a Fiordland wapiti Herd of Special Interest.

The timing of final decision-making is at the Minister's discretion.

The public consultation and submissions process

The consultation period commenced on Monday 10 November 2025 and continued until Monday 8 December 2025. Key information was available on the website from the 8 November 2025 and included the:

- the draft Fiordland Wapiti Herd Management Plan.
- consultation support document, providing information on:
 - how to make a submission;
 - the summary of submissions process and privacy matters;
 - key context relevant to the draft Herd Management Plan; and
 - questions and answers to support submitters and submissions.
- a standard privacy statement and information on the potential public release of submissions

How submissions were made

There were three ways to make a submission (detailed on the webpage):

- online submissions portal:
 - provided submitters an opportunity to select from preset drop-down options of support, support in part, neutral, oppose in part, or oppose the Plan as whole;
 - submitters could choose to make specific comments in free-text comment boxes;
 - gave submitters the option to include or attach additional documents as part of their submission.
- email, through the wapitihosihmp@doc.govt.nz e-mail address:
 - email submissions, and any associated attachments, were imported to the online submission portal by Department staff.
- postage:
 - to the Department's office in Cashel Street, Christchurch.

Email submissions

As well as being emailed to the wapitihosihmp@doc.govt.nz e-mail address, a small number of submissions were lodged by email directly to the Minister for Hunting and Fishing.

Multiple or duplicate submissions

Some submitters provided their feedback via multiple channels – for example, via email and the online submission portal.

During submissions processing and categorisation, these submissions were identified and managed to ensure submission points and feedback was captured, while also removing duplication.

Individuals making submissions in a personal capacity and on behalf of organisations

Where submitters lodged submissions personally and on behalf of an organisation (e.g. a local branch of a national association or a catchment protection group), their name appears at multiple points in the submissions record.

Submissions addressing both the Fiordland wapiti and sika herd management plans

A small number of submitters addressed both the Fiordland wapiti and sika draft herd management plans in the same single submission document. Occasionally, these submissions were lodged only in relation to one of the processes. Where a single submission addressed both draft plans, the submission was accepted and included in the submission record for both processes, regardless of whether it was submitted in relation to one or both processes.

Late submissions

Two submissions were received after 8 December, and before 14 December 2025. These submissions were accepted and are included in this report and related record of submissions.

Template submissions

Some stakeholder groups or individuals released guidance or templates for others to use or follow in their individual submissions.

Where this occurred, every submission using the guidance or template material was recognised in its own right, and the individual submission points processed in a uniform way to ensure consistency.

Process methodology

In preparation for this summary:

- all submissions were collated into a single dataset and key themes and feedback extracted;
- the dataset was analysed using two analysis agents - Microsoft Co-pilot 365 and the Microsoft Co-pilot Researcher agent (both using the GPT-5.2 GEN AI model), and
- the analysis was checked by Department staff to ensure all themes were captured and verified alongside the relevant section of the draft Plan.

Further analysis will be undertaken as the draft Plan is revised.

What we heard

Overall, on the plan as a whole

A total of **352** submissions were received.

Table 1. sets out the position of the 300 submitters who provided a comment on the Plan as a whole.

Some submitters chose to only submit on parts of the plan. For example, a submitter may have only commented on objectives and strategies relating to the management of recreational hunting. Submissions of this nature are not addressed in the percentages set out in Table1.

Position	Percentage of submissions
Support	55.3%
Support in part	10.7%
Neutral	0.3%
Oppose in part	1.7%
Oppose	27.3%
No stated position	4.7%

Table 1: Position of submitters who provided comments on the Plan as a whole

Reasons for support

Submitters provided the following reasons for supporting the draft Plan or supporting it in part:

1. hunter-led delivery and capability, citing the experience and track record of the Fiordland Wapiti Foundation. This is a practical way to manage the herd at a low cost to the public;
2. pragmatic approach in a challenging landscape - eradication of wapiti is unrealistic. A Herd of Special Interest is a workable compromise that manages the impacts of wapiti while providing opportunities for hunting;
3. recognise the cultural, social and recreational value of the wapiti herd and time spent outdoors;
4. economic benefits for local businesses and regional tourism; and
5. positive outcomes for both conservation and communities, with healthier more sustainable deer populations that reduce environmental pressure and improve the hunting experience.

Reasons for opposition

Submitters provided the following general reasons for opposing the draft Plan or opposing it in part:

1. fundamentally contradicts the purpose of New Zealand's national parks and conservation laws, which are designed to protect native species and ecosystems. Introduced pests are supposed to be reduced or removed, not granted protection;
2. ecological impacts of deer in destruction of the forest understorey and seedlings, preventing the regeneration of native trees and plants;
3. climate change related issues, including deer contributions to loss of forest carbon storage potential and impacts on forest resilience;

4. sets Fiordland forests on a trajectory of collapse, loss of habitat for native wildlife, and soil disturbance and erosion;
5. deer must be eradicated or kept to a minimum to allow native forests to recover. The Plan would do the opposite by institutionalising the presence of deer, making a pest a protected species and repeating New Zealand's past mistakes with introduced pests;
6. lack of trust in the proposed management model - having hunters in charge of invasive species management in a World Heritage Area is a conflict of interest;
7. need for increased control, if not eradication, of deer from the National Park;
8. need for mandatory culls under strict ecological parameters, with required targets;
9. need for regular review of the herd's impact (e.g. every five years) and the ability to abolish the Plan and HOSI designation if it is not delivering positive results for the environment;
10. contrary to Treaty of Waitangi obligations, and question involvement of Treaty partners in the process and Plan development;
11. the draft Plan leans too far towards hunters and is contrary to the wider public interest; and
12. relationship and sequencing of the plan development process with the Game Animal Council (Herds of Special Interest) Amendment Bill.

Mixed or neutral views

Submitters provided the following general reasons for mixed or neutral views on the draft Plan:

1. support the overall goal of balancing hunting and conservation, and improving deer management, but with serious reservations about the details of how this occurs;
2. need for clearer ecological bottom lines, independent scientific monitoring and regular transparent review to ensure the approach is benefitting the environment; and
3. concerns over precedent effect of designating Fiordland wapiti a Herd of Special Interest.

Common suggestions for improvement

Submitters provided the following suggestions for general improvement of the draft Plan:

1. strengthen conservation safeguards by setting clear, measurable ecological outcomes, thresholds and triggers if outcomes are not met;
2. strengthen monitoring and reporting, including transparent data availability, public reporting and independent ecological audit;
3. clarify roles and responsibilities across the Department of Conservation, the Game Animal Council, Iwi/Treaty Partners and the Fiordland Wapiti Foundation, including who makes decisions and who delivers;
4. funnel plan implementation funding and resources directly to the Fiordland Wapiti Foundation;
5. removal of all references to animal 'control', with 'active animal management' language preferred;
6. strengthen Treaty partnership provisions, with clearer responsibilities and stronger engagement in the draft Plan and its implementation;
7. include review and adaptation provisions;
8. provide clarification on the relationship between deer management and broader pest control operations, including aerial control and toxins, where required;
9. clearer settings so the plan is practical, measurable and durable;
10. include clear guidance on the legal implications of HOSI designation and the differences between the Wild Animal Control Act 1977 framework and that associated with the Game Animal Council Act 2013; and
11. include measurable objectives for herd and ecological health.

Many of the themes expressed on the draft Plan as a whole are discussed in more detail alongside specific provisions of the draft Plan. These are set out below.

Plan section 1 – Introduction, key parties and relationships

The following key themes and feedback were received from submitters:

1. provide clearer explanations of governance and operational roles for the Fiordland Wapiti Foundation, Game Animal Council, Iwi and the Department of Conservation to avoid future confusion or disputes;
2. update to include an explanation and analysis of how the document (and HOSI designation more broadly) are consistent with the overriding considerations requirements in the Game Animal Council Act 2013;
3. provide detailed discussion of the legal implications of designating Fiordland wapiti a Herd of Special Interest – including differences between management as ‘game animals’ under the Game Animal Council Act and management as ‘wild animals’ under the Wild Animal Control Act 1977.

Plan section 2 – Values and key context

The following key themes and feedback were received from submitters:

1. Fiordland wapiti are of significant economic, social, heritage, community and cultural value to individuals, local communities (particularly Te Anau and Southland), and New Zealand in general;
2. wapiti are a taonga, and this should be reflected in the Plan;
3. the importance of the origin of Fiordland wapiti as a gift from United States President Theodore Roosevelt
4. Roosevelt’s emphasis on protecting the environment as a pathway to support herd health is reflected in the vision and values of the Fiordland Wapiti Foundation;
5. recognise the importance of the preservation of indigenous biodiversity and the threat introduced browsers pose to those values;
6. natural values should be elevated over those associated with introduced deer species;
7. natural values and values associated with hunting and introduced browsers cannot be reconciled;
8. the characterisation of wapiti as a taonga is objectionable;
9. the ‘protection’ of an invasive ungulate population conflicts with Ngāi Tahu responsibilities of kaitiakitanga and whakapapa-based relationships to the whenua;
10. there is no place for accommodating an introduced ‘pest’ species on public conservation land – and particularly not in a National Park and World Heritage Area;
11. set out in greater detail values associated with the Te Wāhipounamu South-West New Zealand World Heritage Area and include analysis and explanation of how the Fiordland wapiti Herd of Special Interest is consistent with the World Heritage Area statement of Outstanding Universal Values;
12. reorder the values and context section to address herd and hunting values first, given the herd management nature of the Plan; and
13. address natural values first, given the importance of indigenous biodiversity and as a healthy ecosystem is critically important for both herd health and the hunting experience.

Plan section 3 – Objectives and strategies

Objective 1 - regarding the maintenance of natural biodiversity, restoring ecological processes and browsed communities, and preventing the loss of indigenous species

The following key themes and feedback were received from submitters:

1. endorse the Objective as setting the environmental framing for the plan, and as a statement attempting to balance herd management with biodiversity outcomes;
2. make the Objective clearer and easier to measure - replace words such as ‘restoring’ with more measurable language such as ‘improving’;
3. should specify outcomes, thresholds and clear ecological bottom lines – and spell out what happens if monitoring shows these are not met;

4. explicitly link the objective to measurable indicators such as regeneration of browsed species, understorey condition and canopy health;
5. protection of introduced deer in a national park conflicts with ecological restoration;
6. concerns about the effect of introduced deer on long term forest health and resilience, and indigenous biodiversity;
7. should seek eradication of browsing ungulates opposed to any form of 'management'; and
8. should better reflect that hunters can contribute to improved outcomes for indigenous biodiversity through hunter-led control, targeted population management, and contributions to broader conservation work such as pest and predator control in difficult terrain.

Objective 2 – regarding enhancing the hunting experience and quality bulls

The following key themes and feedback were received from submitters:

1. highlight the value of high-quality animals and a well-managed hunting opportunity as defining features of the Fiordland wapiti hunting experience;
2. a high-quality hunting experience depends on habitat condition and herd health through population control, not just on maintaining trophy animals;
3. clarify herd quality and hunting outcomes sit alongside biodiversity outcomes, rather than compete with them;
4. should include explicit emphasis on harvesting hinds as well as stags to support both herd structure and environmental outcomes; and
5. Objective may be detrimental to or compete with biodiversity outcomes and conservation values within Fiordland National Park.

Objective 3 – regarding revenue and partnerships

The following key themes and feedback were received from submitters:

1. funding should go directly to the entity undertaking day to day implementation of the Plan and management of Fiordland wapiti – rather than through government agencies;
2. the Fiordland Wapiti Foundation should be the entity undertaking day to day implementation of the Plan and management of Fiordland wapiti;
3. specify the preferred funding pathway for the Fiordland wapiti Herd of Special Interest and Plan implementation;
4. a 'user pays' model is important for maintaining independence and continuity of herd management effort; and
5. it may be appropriate for administrative costs to be borne by the Crown – but any Crown funding should not detract from conservation budgets elsewhere.

Objective 4 – regarding engaging the hunting community

The following key themes and feedback were received from submitters:

1. hunter-led management of Fiordland wapiti is practical and aligned with long-standing involvement in Fiordland stewardship;
2. better recognise and enable volunteer contributions through the Plan;
3. hunter led management is a key driver of hunter tourism and provides economic benefits to the Te Anau region;
4. the objective could legitimise herd protection or lead to wapiti numbers that exceed ecological limits;
5. strengthen wording so the objective better reflects the active participation and responsibility of the hunting community;
6. explicitly link community involvement to both herd management and conservation outcomes; and

7. support partnerships and engagement with a broader audience, including hunters, iwi, local communities, conservationists, and others, rather than focusing on one stakeholder group.

Objective 5 - regarding Treaty partner relationships and the enhancement of Runanga involvement

The following key themes and feedback were received from submitters:

1. support for seeking to strengthen relationships and increase opportunities for Papatipu Rūnanga and Te Rūnanga o Ngāi Tahu participation in the management of Fiordland wapiti;
2. the objective should reflect aspirations of Treaty partners for involvement in the Fiordland wapiti Herd of Special Interest and Plan implementation;
3. amend to be more aspirational, with a greater focus on regular engagement and identification of shared ambitions and opportunities for involvement;
4. embed the role of iwi into planning and review cycles, rather than including a general objective related to Treaty partner relationships and involvement;
5. the Treaty Partnership means this objective should do more than seek to enhance opportunities for participation in the management of Fiordland Wapiti;
6. query whether the objective is consistent with Treaty settlement obligations and consider the Plan and potential Herd of Special Interest designation is inconsistent with Ngāi Tahu cultural values and responsibilities to protect taonga species; and
7. while it is important for Treaty Partners to have pathways to be involved in the Fiordland wapiti Herd of Special Interest and Plan implementation, the Plan should not require, obligate or be contingent upon Treaty partner involvement or participation in implementation and decision making.

Objective 6 - regarding knowledge of dynamics between wapiti and indigenous species

The following key themes and feedback were received from submitters:

1. increased knowledge opportunities are an important benefit of designating the Herd of Special Interest;
2. merge Objectives 6–8 into a single 'adaptive management' objective or loop to create a more holistic approach to implementing the plan through an adaptive management framework;
3. the objective is disingenuous, as a range of research already details the impacts deer have on indigenous flora; and
4. who will commission and fund research, and how will the independence of research be ensured?

Objective 7 – regarding monitoring enables adaptive management

The following key themes and feedback were received from submitters:

1. highlight the importance of monitoring within an adaptive management framework;
2. monitoring should be effective and efficient in demonstrating that management of the herd achieves the objectives and strategies of the Plan;
3. monitoring should inform management, rather than being about compliance;
4. promote transparency by providing for public access to monitoring results and clear reporting of trends over time;
5. monitoring should focus on actual impacts on vegetation, regeneration, and biodiversity indicators;
6. do not use faecal pellet counts as part of monitoring; and
7. query who pays for monitoring – the Plan should provide clarity on monitoring budgets and oversight.

Objective 8 – regarding research supporting and enhancing management

The following key themes and feedback were received from submitters:

1. research is a necessary part of adaptive management and long-term learning; and
2. merge Objectives 6-8 into a single adaptive management objective.

Objective 9 - regarding public reporting on achievement of objectives

The following key themes and feedback were received from submitters:

1. accept the intent of reporting and acknowledge its importance, but question whether it should be a stand-alone objective;
2. reporting should be addressed as an administrative procedure rather than an objective or outcome;
3. provide assurances that progress on Plan implementation would be publicly available through reporting; and
4. provide greater clarity about what must be reported, who receives reporting, and what happens if reporting shows underperformance.

Strategy 1 - regarding tools to manage the Fiordland Wapiti Herd of Special Interest and improve the hunting experience

General

The following key themes and feedback were received from submitters:

1. support recognising that recreational hunting, commercial activity, and professional operations all have a role to play in the management of Fiordland wapiti;
2. replace 'control' language with 'management' language, to better align Plan tone with the intent of the Herd of Special Interest framework and value of the Fiordland wapiti herd;
3. oppose the setting and review of annual Wapiti control targets;
4. annualised targets are evidence of a 'body count' approach that is inconsistent with a longer-term game-management model; and
5. reject the overall framing or premise of the strategy as herd management or 'herd protection' cannot align with conservation outcomes in a national park.

Recreational Hunting - sections 1.3 – 1.8

The following key themes and feedback were received from submitters in relation to recreational hunting generally:

1. support strategies specifically focusing on recreational hunting and its contribution to management within the Fiordland Wapiti Herd of Special Interest Area;
2. highlight the long history of recreational hunting in Fiordland and its cultural significance;
3. endorse the plan provisions as reflecting these longstanding relationships and providing a realistic view of the role hunters play in herd management;
4. recreational hunting plays an important but supporting role in wapiti management;
5. acknowledge hunting contributions while maintaining a clear focus on ecological outcomes and noting that additional control methods may be required when browsing pressure is high; and
6. do not identify recreational hunting as being the primary means of deer control within the Fiordland wapiti area.

The following key themes and feedback were received from submitters in relation to ballots and access:

1. ballot and block arrangements under a Herd of Special Interest framework should resemble the existing Fiordland Wapiti Foundation run system as far as possible;
2. concerns about ballot fairness and the impact of ballots and blocks on public access into the Fiordland wapiti area;
3. avoid potential cost barriers for whānau participation and restrictions on accessing contemporary mahinga kai opportunities;
4. limit the number of ballot and block places available to international hunters each year; and
5. criticism of the current ballot process.

The following key themes and feedback were received from submitters in relation to fees and funding:

1. a 'user pays' model is important for maintaining independence and continuity of herd management effort;
2. the charging of fees to hunt during the bugle period is a necessary part of Fiordland wapiti management;
3. important any fees are collected by the Fiordland Wapiti Foundation and to distinguish revenue generated as part of the Herd of Special Interest from DOC or Crown revenue;
4. any central government funding should not be discretionary spend routed through DOC or the Game Animal Council;
5. hunting (even within the Herd of Special Interest context) should not become the domain of wealthy or elite hunters; and
6. criticism of the current ballot fees.

Commercial recovery and professional control operations - section 1.9

The following key themes and feedback were received from submitters:

1. use commercial and professional operators as part of the management toolbox but provide clear criteria detailing the circumstances in which these activities will be undertaken;
2. preference that recreational hunter management options are utilised before more intensive methods;
3. reference to 'control' should be replaced with 'animal management activities';
4. require mandatory professional culls if monitoring shows a decline in ecological health, or predetermined thresholds are not met or exceeded;
5. professional tools must prioritise biodiversity outcomes, rather than herd protection or enhancement; and
6. commercial recovery must not be restricted by the Plan or Herd of Special Interest designation.

Strategy 2: Undertake monitoring and research to support management and decisions making

Monitoring - sections 2.1 – 2.3

The following key themes and feedback were received from submitters:

1. robust monitoring is critical to the Plan's success;
2. a broad monitoring programme without a clear decision purpose would be a waste of effort and money;
3. set out the management responses to be undertaken, depending on what monitoring results show;
4. focus on monitoring vegetation impacts and regeneration, with direct vegetation measures such as permanent plots, seedling ratios and browse indicator methods to be used;
5. remove any reference to faecal pellet counts from monitoring aspects of the Plan as faecal pellet counts are subjective and not a strong measure of impact;
6. explicitly provide for and require that ecological monitoring is undertaken by independent or neutral ecologists;
 - a. monitoring should be by a contracted independent third party (not DOC); or
 - b. DOC should undertake monitoring, independent of the Fiordland Wapiti Foundation or Game Animal Council (if those entities are undertaking day-do-day management and implement the Plan);
7. include mana whenua representatives or expertise alongside technical experts in monitoring design and interpretation;
8. embed tikanga and mātauranga in monitoring and research provisions, rather than providing for these as inputs to be progressed with mana whenua during implementation;
9. support the use of new monitoring tools and technologies as they are developed;
10. include recognition of the utility and use of hunter harvest and hunter generated monitoring or observation data, noting the importance of validating and integrating this data with technical ecological monitoring measures; and
11. require ongoing monitoring of hunter satisfaction with the Fiordland wapiti Herd of Special Interest and its management.

Research - sections 2.4 – 2.7

The following key themes and feedback were received from submitters:

1. use active language that makes it clear who will commission, conduct, and use research related to Fiordland Wapiti and the Fiordland wapiti Herd of Special Interest;
2. set minimum research commitments, while still allowing flexibility to add topics and research areas as knowledge grows;
3. provide for best-practice standards and evidence-based, scientific research, ensuring research can be used and compared over time; and
4. provide for research on the relationship between hunter experience, active management of wapiti and social licence, alongside research focused on the effects of Fiordland wapiti on indigenous flora.

Strategy 3: Foster partnerships and community stewardship

Foster Partnerships - sections 3.1 – 3.3

The following key themes and feedback were received from submitters:

1. support for partnerships bringing together hunters, the Department, iwi, and community groups;
2. remove phrases such as 'associated with' the herd, as this wording unduly constrains the scope of potential partnerships;
3. reflect the importance of the Treaty partnership and treaty settlement obligations under the Ngāi Tahu Claims Settlement Act 1998; and
4. concerns about the promotion of the Fiordland wapiti experience to international markets, as international hunter interest risks crowding out or limiting opportunities available to domestic or local hunters.

Community Stewardship - Strategy 3.4 – 3.10

The following key themes and feedback were received from submitters:

1. support for the recognition of and provision for hunter led conservation actions, including predator trapping and hut and track work;
2. the Fiordland Wapiti Foundation is a key example of sustained on-the-ground community conservation work;
3. requires amendment to provide for management rather than control narratives, and to better reflect the language of the Game Animal Council 2013;
4. should approach and promote stewardship opportunities from a mana whenua perspective (i.e. kaitiakitanga), rather than focusing on stewardship from the perspective of the hunting community;
5. removal of 'seek to' language from the strategies, with active language preferred to increase accountability;
6. important to give Treaty partners autonomy on how they want to be involved in herd management;
7. ensure stewardship activities complement, but do not substitute for, ecological priorities;
8. while hunter-led predator trapping initiatives are welcome, their contributions are of limited benefit given the scale of the threat introduced predators pose to indigenous fauna; and
9. concerns over whether involvement in stewardship activities could lead to exclusive perks, such as privileged access to hunting or other opportunities on public conservation land.

Strategy 4: Undertake annual planning and reporting on management activities

Annual Operational Plan - section 4.1

The following key themes and feedback were received from submitters:

1. keep annual operational plans separate from the herd management plan and keep them flexible - so they can adapt and innovate over time;
2. the organisation implementing the Plan should develop and update annual operational plans;
3. support for the Fiordland Wapiti Foundation as organisation implementing the Plan;
4. the Plan should set robust and detailed environmental limits and timeframes, with the annual operational plan setting out methods to achieve these in any given year; and

5. require public consultation on the annual operational plans during their development, as part of efforts to improve transparency and accountability.

Annual Report - sections 4.2 – 4.5

The following key themes and feedback were received from submitters:

1. annual reporting is essential for accountability and transparency;
2. financial reporting requirements should remain simple and not create an unnecessary administrative burden on entities involved in Herd of Special Interest management and delivery;
3. concerns about how reporting requirements may affect commercial or sponsor confidentiality;
4. importance of detailed reporting, particularly regarding costs and expenditure where public resources are involved;
5. provide greater clarity about what must be reported, who receives reporting, and what happens if reporting shows underperformance;
6. provide for the public reporting of detailed monitoring results and trends; and
7. the Department of Conservation or an independent body should review the annual report.

Section 4 – Compliance, review and enforcement

The following key themes and feedback were received from submitters:

1. the Herd of Special Interest designation made for Fiordland Wapiti should be revoked if ecological targets are not met within a five-year timeframe;
2. provide a clearer articulation of adaptive management provisions or an adaptive management loop that includes annual tracking, public reporting, and adjustment of settings and the HMP as required, rather than waiting for a statutory review cycle;
3. review processes should include a focus on accountability for the successes and failures of the implementation of the Plan;
4. should provide more information on how overriding considerations will be assessed during the five-year review;
5. should note that assessment against the overriding considerations need not be carried out where only minor amendments to the Plan are proposed, and if the overriding considerations have not undergone significant reform since the last assessment;
6. research should be commissioned before any HOSI designation was made, so as to provide better baseline data for comparison and consideration as part of the five-year Plan review; and
7. Support for and opposition to fines for hunting or killing any animal in a designated area for a Herd of Special Interest without the appropriate authorisation, licence or permit.

Appendices – Maps and glossary

Appendix 1 – Map 1 and Map 2 Fiordland Wapiti Area

The following key themes and feedback were received from submitters:

- support for the defined Fiordland Wapiti Area and ballot blocks;
- the importance of clear boundaries to the Wapiti herd area, and that the herd is contained within this area; and
- facilitating access through temporary helicopter landing permissions is an important safety measure for an aging hunter base.

Glossary

The following key themes and feedback were received from submitters:

- Community - expand the definition of community beyond conservation interests;
- Control target – Remove control-centred language and include definition of ‘herd management activities’;
- Professional control operation – Amend definition to refer to ‘herd management’ instead of ‘control’ and remove reference to ‘wild animals’;
- Herd management activities – Include a definition of herd management activities such as recreational hunting, commercial hunting and professional herd management operations.