To:
Environment Committee

Parliament Buildings

Wellington

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TE TIRA WHAKAMĀTAKI
Indigenous solutions for a better world

Submission on the Game Animal Council (Herds of Special Interest) Amendment Bill

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Te Tira Whakamātaki Submission Opposing the Regulatory Standards Bill

Executive Summary

1. Te Tira Whakamātaki opposes the Game Animal Council (Herds of Special Interest) Amendment Bill in its entirety.

2. The Bill represents a fundamental threat to Aotearoa New Zealand's conservation framework, seeking to exempt designated herds of introduced game animals from the National Parks Act's requirement to exterminate such species "as far as possible."

3. For Māori and for Te Tira Whakamātaki (TTW) as kaitiaki of our ecosystems, this shifts the legal foundation of national parks from biodiversity protection to recreational game management, a model that privileges colonial traditions and economic interests over ecosystem restoration and taonga species protection.

4. The Bill removes critical conservation safeguards, delegates authority to hunting-aligned interest groups, appropriates Indigenous cultural heritage, and contradicts overwhelming scientific evidence about the ongoing ecological damage caused by introduced ungulates.

5. The Minister's May 2025 statement that he is likely to grant Herds of Special Interest (HOSI) status for "economic growth" opportunities confirms this is about commercialising conservation land, not protecting ecosystems.[1]

Core Legal and Conservation Objections

6. Undermining Fundamental Conservation Law

6.1. The Bill removes section 4(2)(b) of the National Parks Act as it applies to designated herds, eradicating a core statutory safeguard that has protected native ecosystems since 1980.

6.2. This fundamentally shifts national parks from conservation-first management to co-management with hunting interests, **creating the first statutory exception allowing introduced species permanent protection** within New Zealand's most protected natural areas.

6.3. The amendment eliminates the current requirement that exemptions be approved by the New Zealand Conservation Authority, an independent, scientifically guided body, and instead hands power solely to the Minister of Conservation, removing the current requirement for oversight by the New Zealand Conservation Authority.

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[1] Otago Daily Times. (2025, May 13). 'Herd of Special Interest' status possible. Retrieved from www.odt.co.nz/regions/'herd-special-interest'-status-possible

This creates a structure where introduced species can be legally protected in national parks without independent conservation scrutiny.

6.4. Although the designation authority lies with the Minister of Conservation, public statements and political advocacy for the Fiordland Wapiti HOSI have come from the Minister of Hunting and Fishing reinforcing the perception of a decision-making process driven by recreational hunting interests rather than conservation science.

6.5. Forest & Bird identifies this removal of crucial safeguards as fundamentally altering national parks' purpose, potentially limiting public, iwi and even the Department of Conservation access where trophy hunting is prioritised.[2]

6.6. International context reveals how radical this departure is from protected area norms. Our national parks hold International Union for Conservation of Nature (IUCN) Category II status designed primarily for ecosystem protection. Te Wāhipounamu - Southwest New Zealand, which includes Fiordland, also holds UNESCO World Heritage status because it is recognised as a site of 'Outstanding Natural Value' globally, deserving of protection and preservation for future generations. It is considered the best modern example of the primitive taxa of Gondwanaland seen in modern ecosystems.[3]

6.7. Comparable nations maintain strict separation between protected species management and recreational hunting. The U.S. National Parks Service operates aggressive invasive species programs and is phasing out 'commercial grazing.'[4] Parks Canada employs systematic invasive-species control, including annual culls and restoration programs led by scientists and Indigenous partners, to restore ecological health in its national parks.[5]

6.8. Australian national parks provide a useful comparison. According to the New South Wales Government, pest control occurs through "integrated pest management programs" led by park authorities across more than 600 reserves, with no recognition or licensing of recreational hunting within national park areas. This demonstrates an international standard for invasive species control that

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[2] Forest & Bird. (2025). *Submission guide: say no to national parks becoming game parks*. Retrieved from https://www.forestandbird.org.nz/resources/submission-guide-say-no-national-parks-becoming-game-parks

[3] UNESCO World Heritage Centre. (1990). *Te Wahipounamu – South West New Zealand*. World Heritage List. Retrieved from https://whc.unesco.org/en/list/551/

[4] U.S National Park Service. *Invasive & Non-Native Species.* Retrieved from www.nps.gov/subjects/invasive/animals.htm; U.S National Park Services. Management Policies: The Guide to Managing the National Park System, *Chapter 4: Natural Resource Management*. Retrieved from www.nps.gov/subjects/policy/mp-4-natural.htm

[5] Parks Canada. *Care for the land: Parks Canada works to control invasive alien species*. Retrieved from www.parks.canada.ca/nature/science/especes-species/especes-envahissantes-invasive-species and Parks Canada. *Chapter 5: The need for Active Management and Restoration*. Retrieved from www.publications.gc.ca/Collection/R62-323-2000-2-5E.pdf

relies solely on government-led conservation systems, rather than granting hunting privilege or legal protection to introduced browsers. [6]

6.9. The amendment moves New Zealand toward a utilitarian model resembling European hunting reserves rather than maintaining pristine ecosystem protection standards.

7. "Special" Status Driven by Economic, Not Conservation Interests

7.1 In May 2025, the Minister of Hunting and Fishing announced he is likely to grant HOSI status to the Fiordland Wapiti herd, citing "opportunities for economic growth" through domestic and international trophy hunting tourism.[7] This statement, made while the Bill remained under parliamentary scrutiny and before the submission deadline, effectively prejudges the outcome and undermines democratic consultation.

7.2 This admission confirms Forest & Bird's characterisation of this as "a handful of people" seeking to preserve "a handful of deer" for their own recreation at the expense of New Zealand's natural heritage.[8] As Forest & Bird warns, this is "changing the law to let a North American deer use a national park as a glorified vege patch," transforming conservation sanctuaries into economic assets for niche recreational interests.

7.3 We concur. This statement:

- Confirms the motivation behind this Bill is not conservation but commercialisation.
- Prejudges the outcome of a supposedly open public submission process.
- Confirms the fears of conservation organisations that this Bill prioritises a handful of people over public ecological interests.

8. No Cultural or Ecological Basis for "Special" Protection

8.1. Wapiti in Fiordland are not genetically pure or culturally significant to Aotearoa. They are hybrids of North American Elk (*Cervus canadensis*) and Red Deer (*Cervus elaphus*), bred through deliberate introductions in 1905 for recreational sport.[9] They have no whakapapa connection to Aotearoa and are not recognised as taonga by tangata whenua.

8.2. The term "wapiti" itself represents profound cultural appropriation. Deriving from Shawnee and Cree languages meaning "white rump," it carries deep cultural

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[6] NSW Government. *Managing pest animals and weeds in our national parks*. Retrieved from www.environment.nsw.gov.au/topics/animals-and-plants/pest-animals-and-weeds/managing-pest-animals-and-weeds

[7] See 1

[8] Forest & Bird. (2025). *Wapiti latest and Q&A*. Retrieved from https://www.forestandbird.org.nz/resources/wapiti-latest-and-qa

[9] Fiordland Wapiti Foundation. *Fiordland Wapiti Herd: History.* Retrieved from www.fwf.net.nz/wapiti/#history

significance for Indigenous North American peoples who consider elk sacred relatives bringing strength, endurance, and patience.[10] The elk forms the basis for warrior societies and features prominently in ceremonial traditions. Using this sacred Indigenous name without permission for animals that actively damage Indigenous Māori ecosystems represents double appropriation, celebrating one Indigenous culture's sacred animal while that same species harms another Indigenous culture's environment.

8.3. The groundbreaking "(Re)storying the Possum" work, led by Te Tira Whakamātaki, demonstrates how cross-cultural Indigenous approaches can honour both conservation imperatives and cultural responsibilities. In May 2024, Te Tira Whakamātaki facilitated a wānanga at Pipitea Marae bringing together Māori kaitiaki and Aboriginal possum-skin cloak knowledge holders from southeastern Australia.[11] This groundbreaking exchange recognised that possums are sacred to Aboriginal peoples while acknowledging their devastating impact on Māori ecosystems. Through ceremony and cultural protocols, Māori gifted possum pelts to Aboriginal cloakmakers, allowing the restoration of traditional practices interrupted by colonial laws that criminalise possum hunting in Australia.

8.4. This approach demonstrates how Indigenous-led solutions can transform "pest control" into culturally meaningful exchanges that heal both ecosystems and relationships. Rather than appropriating names and imposing external values, the work of Te Tira Whakamataki shows how authentic consultation and reciprocity can address complex conservation challenges while honouring Indigenous sovereignty.

8.5. The contrast with the wapiti designation could not be starker, where one approach seeks to entrench colonial hunting privileges using appropriated cultural names, the other creates genuine Indigenous partnerships that address root causes of environmental damage.

Addressing Game Animal Council Arguments

9. The Game Animal Council's (GAC) justifications for HOSI designation reveal the fundamental flaws in their approach, prioritising recreational and economic interests over ecosystem protection.

10. "Special Interest" Criteria Expose Commercial Priorities

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[10] Native Memory Project. *Wapiti*. Retrieved from https://nativememoryproject.org/animal/wapiti/ and Native Hope. *Native American Animals: the Elk, a Protector and Relative*. Retrieved from https://blog.nativehope.org/native-american-animals-the-elk-a-protector-and-relative

[11] RNZ. (2024, May 21). 'Cloaks are really sacred to our people': Possum pelt exchange fosters indigenous bond. Retrieved from https://www.rnz.co.nz/news/te-manu-korihi/517485/cloaks-are-really-sacred-to-our-people-possum-pelt-exchange-fosters-indigenous-bond

10.1 The GAC's own criteria for "special interest to hunters" explicitly prioritise commercial and recreational values over conservation:[12]

- Hunting opportunity: maintaining or improving hunting quality and quantity.
- Economic benefits: generating or enhancing economic returns from tourism and hunting.
- Historical significance: preserving hunting traditions rather than ecological integrity.

10.2 These criteria reveal that "special" status has nothing to do with conservation value or cultural significance to tangata whenua. Instead, it represents a mechanism for commercialising conservation land to benefit a small recreational constituency. The GAC's own language confirms this is about preserving "hunting purpose" and "sustained availability of quality animals" for hunters, not protecting indigenous ecosystems.

11. False Claims About Conservation Compatibility

11.1 The GAC argues that HOSI management will be "consistent with the wider conservation framework" while simultaneously removing the fundamental conservation requirement to exterminate introduced species. This contradiction exposes the inherent tension between maintaining huntable populations and achieving genuine conservation outcomes.

11.2 Current research demonstrates that even ‘successful’ hunter-led management maintains browser pressure above levels found in areas with near-total deer removal.[13] The GAC's framework accepts chronic low-level ecosystem damage as an acceptable trade-off for hunting opportunities. A position fundamentally incompatible with conservation science and Te Tiriti obligations to protect taonga species.

12. "Hunter-Led Conservation" as Industry Capture

12.1 The GAC promotes the Fiordland Wapiti Foundation (FWF) as a model of ‘hunter-led conservation’ but this represents industry capture of public conservation resources. While the FWF conducts valuable predator control work, their primary goal remains maintaining a quality herd for trophy hunting opportunities. This creates structural conflicts where conservation work serves hunting interests rather than ecosystem restoration.

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[12] New Zealand Game Animal Council. (2025). *HOSI FAQs*. Retrieved from https://nzgameanimalcouncil.org.nz/hosi-faqs/ and Department of Conservation. (2025). *Role of Game Animal Council*. Retrieved from https://www.doc.govt.nz/about-us/statutory-and-advisory-bodies/game-animal-council/role/

[13] Husheer, S. W., & Tanentzap, A. J. (2024). Hunting of sika deer over six decades does not restore forest regeneration. *Journal of Applied Ecology*, 61, 134–144. **https://doi.org/10.1111/1365-2664.14544**

12.2 The proposed HOSI management structure reveals these inherent conflicts. The FWF proposal seeks to manage 190,700 hectares (15% of Fiordland National Park) with objectives that explicitly prioritise hunting outcomes alongside ecological monitoring. Their ecological objectives set browse levels of merely '10% or less' on alpine species, a standard that accepts ongoing ecosystem damage as acceptable.[14] Meanwhile, their hunting objectives focus on "generating male wapiti with desirable trophy quality" and "maximising recreational hunting opportunities."[15]

12.3 The Central North Island Sika Foundation (SF) proposal exposes the same fundamental conflicts between hunting and conservation goals. Despite acknowledging that "deer browsing on beech seedlings and saplings is a key issue affecting regeneration," their HOSI proposal aims to "enhance or maintain hunter satisfaction with sika venison quality and the overall sika hunting experience" and "facilitate and optimise hunter access."[16] The proposal explicitly prioritises "enhancing or maintaining hunter contributions to sika population management" rather than achieving the intensive control needed for forest recovery.[17]

12.4 The proposal's funding models exposes the commercialisation agenda. At minimum annual costs of around $800,00 plus additional costs for vegetation monitoring, the HOSI would operate through Crown funding, FWF and SF contributions, and crucially, fees charged to hunters.[18] This transforms national park access from a public right, into a commercial transaction where wealthy trophy hunters gain privileged access to premium hunting experiences subsidised by taxpayers.

12.5 The GAC's claim that "hunting benefits both hunting and conservation" ignores the fundamental issue, that recreational hunting groups will never voluntarily eliminate species they value for hunting, even when ecological science demands eradication.[19] The HOSI proposal confirms this, despite acknowledging current deer impacts, it seeks to perpetuate the presence of pests indefinitely through "adaptive herd management" that prioritises hunting sustainability over ecosystem recovery.

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[14] Department of Conservation. (2025). *Wapiti deer proposal for a Herd of Special Interest*. Retrieved from https://www.doc.govt.nz/nature/biodiversity/wild-animals-management/waipiti-deer-proposal-for-a-herd-of-special-interest/

[15] See 12

[16] Department of Conservation. (2025). *Sika deer proposal for a Herd of Special Interest*. Retrieved from https://www.doc.govt.nz/nature/biodiversity/wild-animals-management/sika-deer-proposal-for-a-herd-of-special-interest/

[17] See 14

[18] See12 and 14

[19] New Zealand Game Animal Council. (2025). *GAC (HOSI) Amendment Bill*. Retrieved from https://nzgameanimalcouncil.org.nz/gac-hosi-amendment-bill/

Scientific Evidence of Severe Ecological Damage

13. Overwhelming Evidence of Ecosystem Harm

13.1 Peer-reviewed research demonstrates that introduced game animals cause severe, ongoing ecological damage that recreational hunting cannot control. A landmark 2024 study published in the Journal of Applied Ecology found that 60 years of hunting sika deer could not restore forest regeneration, definitively showing that recreational hunting pressure alone cannot prevent ongoing browsing damage to native forests.[20]

13.2 DOC's own scientific documentation of sika deer impacts provides stark evidence of the failure of recreational hunting to control ecological damage. The Central North Island Sika Foundation's HOSI proposal acknowledges that "mature beech forest in the central North Island periodically dies off naturally, creating large gaps in the forest canopy" but reveals that in recent decades, "some beech forests have struggled to regenerate, or regeneration has become patchy."[21] The primary cause is clear "deer browsing on beech seedlings and saplings is a key issue affecting regeneration at some sites."[22]

13.3 Most damning is DOC's documentation that recreational hunting has comprehensively failed to achieve forest recovery. In the Kaweka Mountain Beech Project from 1998-2015, modelling found that with recreational hunting alone, most plots would take over 80 years to achieve forest canopy closure, with some taking over 100 years, and some plots never reaching minimum seedling numbers even after 100 years.[23] This contrasts starkly with aerial control methods that achieved canopy closure within 20-40 years and fencing that could close canopy gaps within 40 years.[24]

13.4 Forest & Bird characterises wapiti-red deer hybrids as "vacuum cleaners of vegetation," consuming hundreds of species of plants, from grasses and herbs to the buds, leaves, and bark of shrubs and trees.[25] In their North American habitat, elk graze on broad open pastures, but the steep forests and delicate alpine zones of Aotearoa, particularly Fiordland, offer no such feed, forcing animals to voraciously devour native plants that lack evolutionary defences against mammalian browsers. This includes palatable trees like broadleaf (Griselinia) whose berries are vital food for native birds.

13.5 Historical evidence provides stark warnings about deer impacts. When deer populations were uncontrolled in the mid-20th century, dramatic habitat

[20] See 11
[21] See 14
[22] See 14
[23] See 14
[24] See 14
[25] See 6

degradation occurred with alpine grasslands heavily overgrazed until government culling began in the 1960s. In one core wapiti range, deer densities were reduced by ~81% between 1969 and 1984 through aerial hunting, bringing deer signs to near-zero in alpine zones and allowing vegetation to begin recovering. Conversely, in areas where deer remained abundant, significant declines in plant cover and seedling regeneration were observed. [26]

14. Browsing Animals Undermine Land Stability, Worsening Climate Impacts

14.1 The ecological damage caused by browsing animals goes beyond vegetation loss. Research shows that deer, goats, tahr, and other ungulates contribute to soil destabilisation by destroying understorey vegetation and compacting soils through trampling. These impacts weaken root systems, reduce water retention, and increase erosion rates.

14.2 The link between ungulate-driven deforestation and land instability is well documented. In the wake of Cyclone Gabrielle, regions with degraded hill country and high deer densities experienced catastrophic landslides and sediment loss. Native forests provide critical ecosystem services like slope stability and erosion control. By removing this vegetation buffer, browsing species amplify the intensity of storm-driven damage.

14.3 Introducing permanent legal protection for large-bodied browsers in steep, erosion-prone terrain would increase the frequency and severity of land instability, particularly under intensifying climate conditions. Such outcomes are not only environmentally irresponsible but economically costly and a direct threat to the communities who live or work downstream.

14.4 Beyond destabilising land, over-browsing contributes to a higher fire risk in Aotearoa New Zealand's native forests. Introduced ungulates remove moisture-retaining vegetation layers, reduce canopy shade, and disrupt native forest structure. This exposes forest floors to direct sunlight and drying winds, leading to drier fuel beds.

14.5 Studies have shown that ungulate presence can shift understorey species composition toward more flammable vegetation, such as introduced grasses, shrubs, and dry woody debris. These changes increase the likelihood, intensity, and spread of wildfires, a risk exacerbated by climate change and longer dry periods.

14.6 With intensifying El Niño conditions and rising temperatures, continuing to support browser populations in vulnerable landscapes such as Fiordland not only

[26] Ewans, R. (2010). "Deer impacts in alpine grasslands of Fiordland National Park: A report on the measurement of alpine browse transects between 2006 and 2009." Department of Conservation Te Anau Area Office, August 2010. www.doc.govt.nz/documents/conservation/threats-and-impacts/animal-pests/southland/deer-impacts-in-alpine-grasslands-of-fiordland-national-park.pdf

undermines erosion control but elevates wildfire risk, threatening biodiversity, community safety, and long-term resilience.

15. Even "Successful" Management Fails Ecological Standards

15.1 Even current "managed" populations continue causing measurable damage. While the Fiordland Wapiti Foundation has reduced browse levels on indicator alpine plants by roughly half since active deer control began in the 2000s, this recovery remains relative, browser pressure in the wapiti range is still higher than in areas with near-total deer removal. In the Murchison Mountains, where government-funded culling has kept deer near zero to protect the rare takahē bird, browsing was "virtually nil" and vegetation flourished, a stark contrast to even the best-managed wapiti blocks.[27]

15.2 The Central North Island Sika Foundation's own evidence demonstrates that recreational hunting cannot achieve forest recovery timescales. Despite decades of hunting in the Kaweka Forest Park, DOC's research shows that areas with inadequate hunting pressure and high sika deer populations experience complete forest failure, where "no saplings survive to fill canopy gaps, and the forest turns to low scrubland." Even with enhanced recreational hunting, modelling found most plots would require 40-80+ years for canopy closure, with some never reaching minimum seedling thresholds even after 100 years.

15.3 The proposed HOSI management targets reveal acceptance of ongoing ecosystem damage. The FWF proposal sets browse levels of "10% or less on three alpine species" as an acceptable ecological target, while the Sika Foundation proposal aims merely for "seedling growth for canopy species leading to sustainable forest canopy regeneration" without defining specific timescales or success metrics.[28] These vague targets prioritise hunting sustainability over ecological integrity. True conservation would aim for browse levels approaching zero, as achieved in fully protected sanctuaries.

15.4 The wapiti proposal's 25 management blocks covering 190,700 hectares would institutionalise chronic environmental harm across 15% of Fiordland National Park. Rather than working toward ecosystem restoration, the HOSI framework accepts permanent introduced species presence as inevitable, abandoning the conservation principle that national parks should be managed primarily for indigenous biodiversity protection.[29]

15.5 Current monitoring by DOC shows ungulate populations have increased steadily since the 1980s despite hunting pressure, confirming that recreational hunting

[27] See 24
[28] See 12 and 14
[29] See 12

cannot control populations to ecologically acceptable levels.[30] For example, aerial surveys estimate 22,100-40,150 tahr across management units, with densities of 2-4 per hectare in "managed" areas, well above the 10,000 total population target set in the 1993 control plan.[31]

Management Organisations Prioritise Hunting Over Conservation

16. Structural Bias Toward Game Preservation

16.1 Investigation into organisations like the Fiordland Wapiti Foundation (FWF) reveals groups that, while conducting some conservation activities, fundamentally exist to maintain huntable game populations rather than optimise ecological outcomes. The FWF explicitly states its goal of "maintaining a quality herd for future trophy hunting opportunities," with conservation work serving this primary objective rather than ecosystem restoration.[32]

16.2 The FWF currently manages a 175,000+ hectare "Wapiti Area" in Fiordland under a unique arrangement where a recreational hunting group effectively controls an introduced species inside a national park / world heritage site. Their stated goal is maintaining a "low-numbered, high-quality wapiti herd," deliberately keeping overall deer populations low while fostering mature trophy bulls for hunters.[33] This approach **prioritises** trophy genetics over ecosystem protection, with the FWF stating they conduct dedicated culls targeting "non-wapiti type" deer and hybrids to preserve pure wapiti bloodlines – even if that bloodline isn't proven.

16.3 Data shows the FWF removes approximately 1,000-1,400 deer annually through helicopter culling, alongside 150 taken by ground hunters during rutting season. This represents over 50% of all deer removed from Fiordland National Park despite the wapiti area comprising only 14% of the park. The Foundation also conducts valuable predator control (operating 500+ stoat and rat traps) and maintains backcountry infrastructure, all funded through hunter donations and permit fees rather than taxpayer funding.

17. Fundamental Conflicts Between Hunting and Conservation Goals

17.1 However, this 'conservation through hunting' model creates fundamental tensions. Independent conservationists question whether the hunters' primary aim is ecological protection or preserving hunting privileges. Forest & Bird notes that wapiti are maintained as a breeding population, the goal is not eradication but keeping enough deer for future trophy opportunities. This creates inherent

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[30] Department of Conservation. (2025). *Tahr and conservation*. Retrieved from https://www.doc.govt.nz/tahr-and-conservation

[31] See 28

[32] Fiordland Wapiti Foundation. *Fiordland Wapiti Foundation.* Retrieved from www.fwf.net.nz

[33] Fiordland Wapiti Foundation. *The Foundation: Herd Management.* Retrieved from www.fwf.net.nz/wapiti/herd-management/

conflicts, recreational hunters generally prefer shooting adult males (trophies) while leaving behind females that breed and replenish herds.

17.2 The fundamental issue is one of priorities. **Hunters undeniably help reduce deer numbers, but they do so to maintain a sustainable hunting resource**, **not to fully rid the park of deer or protect unique ecosystems**. As Forest & Bird emphasises, recreational hunting alone is "*not enough to keep deer numbers in check... or allow native ecosystems to thrive*" without other controls in the toolkit.[34]

17.3 Critics fear the underlying interest in Herds of Special Interest is protecting sport and economic interests by ensuring pest animals will always remain in our unique landscapes, like Fiordland or Kaweka. Whereas ecological purists argue for total eradication in national parks over time**.**

Game Animal Council: Structural Bias Against Conservation

18. Industry Capture of Public Decision-Making

18.1 The Game Animal Council's composition reveals an organisation structurally designed to prioritise hunting over conservation, with all current members having direct hunting backgrounds or industry connections and no independent conservation scientists (thought there is a legal academic).[35] Chair Grant Dodson serves as CEO of City Forests Limited while other members lead hunting organisations, organise hunting competitions, or represent hunting industry interests. This composition fulfils the council's primary statutory mandate to represent the interests of the hunting sector but fundamentally conflicts with its secondary objective to "contribute to positive conservation outcomes."[36]

18.2 The inherent tension manifests in the Game Animal Council's strategic objectives, which explicitly aim to "enhance the quality of game animal herds" (objective 3) and "improve acceptance of game animals as valued introduced species" (objective 6), positions directly contrary to conservation science consensus.[37]

18.3 Past controversies illuminate these conflicts, the Game Animal Council has questioned the science behind 1080 poison operations despite their critical importance to native species protection, and board members have attended

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[34] See 23

[35] New Zealand Game Animal Council. (2025). Who Are We: The Council. Retrieved from www.nzgameanimalcouncil.org.nz/who-we-are/

[36] GAC Strategic Plan - www.nzgameanimalcouncil.org.nz/strategic-plan/ and Game Animal Council Act 2013 - www.legislation.govt.nz/act/public/2013/0098/latest/DLM4105068.html New Zealand Game Animal Council. (2025). Strategy and Reporting. Retrieved from www.nzgameanimalcouncil.org.nz/strategic-plan/ and New Zealand Legislation. (2013). *Game Animal Council Act 2013*. Retrieved from https://www.legislation.govt.nz/act/public/2013/0098/latest/DLM4105077.html

[37] New Zealand Game Animal Council. (May 2023). Strategic Plan Sustainable management of game animals and hunting for recreation, communities, commerce and conservation. Retrieved from www.nzgameanimalcouncil.org.nz/wp-content/uploads/2023/05/GAC_Strategic-Plan-2023-Final.pdf

Safari Club International conventions discussing financially supporting international pro-hunting lobby groups.[38]

19. Removal of Environmental Safeguards

19.1 The proposed amendment dramatically expands the Game Animal Councils powers while removing crucial oversight mechanisms. Currently minimal oversight would be further weakened by removing National Parks Act requirements and eliminating the New Zealand Conservation Authority's role in exemption decisions. No independent environmental assessment requirements exist for HOSI designations, creating a process where industry-dominated decision-making occurs without statutory environmental safeguards.

19.2 The New Zealand Conservation Authority warned in 2010 that the Game Animal Council would "generate increasing conflicts, escalate costs, and undermine integrated management of public conservation land," predicting members "accountable only to hunters" would be inappropriate for public resource management.[39] These predictions have proven accurate, with Forest & Bird characterising the Game Animal Council as an "elite body" benefiting "wealthy hunters" while harming native flora and fauna.

Cultural and Treaty Implications

20. Perpetuating Colonial Conservation Models

20.1 From a Māori perspective, this Bill perpetuates the privileging of colonial hunting traditions over Indigenous environmental values, the continued degradation of taonga species and habitats, and the exclusion of iwi and hapū from decision-making on conservation matters in their own rohe (region). The misuse of Indigenous language (wapiti) without consent or cultural relevance compounds these issues.

20.2 The Bill creates real risk of legal conflict with settlement acts and Te Tiriti o Waitangi. For example, the Ngāi Tahu settlement requires the Crown to uphold the tino rangatiratanga of Ngāi Tahu which includes protecting the ecological integrity of Te Wāhipounamu, while the WAI 262 claim underscored the need for Māori-led approaches to conservation, including invasive species management. Treaty partners should have shared authority, not be shut out of decisions regarding invasive species in their own ancestral lands.

21. Violation of Indigenous Rights and Responsibilities

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[38] Edwards, Bryce (2025). "New Zealand Game Animal Council." The Integrity Institute, April 8, 2025. Retrieved from www.theintegrityinstitute.substack.com/p/new-zealand-game-animal-council

[39] Department of Conservation. (2010). *NZCA advice on proposed game animal council August 2010*. Retrieved from https://www.doc.govt.nz/about-us/statutory-and-advisory-bodies/nz-conservation-authority/advice-to-the-minister-and-or-director-general/game-animal-council-august-2010/

21.1 Maranga Ake Ai is a Māori approach to Predator Free 2050, led by Te Tira Whakamātaki but supported by Māori across the country. It is based on a whakapapa-centric approach to environmental practice, intergenerational decision-making, and authentic Treaty partnerships. We do not support preservation of non-indigenous species within the conservation estate unless it is supported and led by mana whenua, protects the mauri of ecosystems, and is grounded in mātauranga Māori and Treaty-based frameworks.

21.2 The wapiti and sika herds meet none of these criteria, and we doubt any other herd would. These are introduced species being elevated above native flora and fauna based on sporting tradition and profit, perpetuating the colonial conservation model that Te Tira Whakamātaki and many iwi and hapū across the motu have long resisted.

Alternative Approaches

22. Viable Management Options Without Legislative Compromise

22.1 International evidence demonstrates multiple viable alternatives to removing extermination obligations that can manage valued game species while maintaining ecosystem protection.

22.2 Translocation programs have proven effective globally, with the Department of Conservation having monitored over 1,000 translocations establishing best-practice guidelines. Well-planned programs achieve success rates of 7-40%, moving animals from sensitive ecosystems to suitable alternative locations while maintaining genetic diversity, including game parks established for special herds.[40]

22.3 Controlled breeding programs outside national parks offer another pathway. Australia operates over 6,000 privately protected areas covering 10+ million hectares where trophy hunting generates significant returns while maintaining habitat for non-game species.[41] European countries successfully maintain game populations in reserves adjacent to but separate from national parks.

22.4 Enhanced management protocols utilising modern technology show particular promise. The U.S. National Parks Service achieved an 11-fold increase in seedling density through 12 years of adaptive deer management at Catoctin Mountain Park. GPS tracking, camera monitoring, and real-time population assessment enable rapid responses to population changes.[42]

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[40] Department of Conservation. (2025). *Translocation: moving animals and plants.* Retrieved from www.doc.govt.nz/get-involved/run-a-project/translocation/

[41] Australian Government (2024). *Pathways to 30 by 30*. Retrieved from https://report.30by30.org.au/

[42] See 4 and U.S. National Park Service (2021). *National Park Service to reduce white-tailed deer populations in six Maryland, Virginia and West Virginia national parks*. Retrieved from https://www.nps.gov/cato/learn/news/

23. Indigenous Co-Management Models

23.1 Indigenous co-management models offer culturally appropriate alternatives that honour both conservation imperatives and hunting traditions. Canada's extensive co-management systems demonstrate successful integration of Traditional Ecological Knowledge with Western science.

23.2 The Klinse-Za Caribou Agreement shows Indigenous-led initiatives can achieve dramatic conservation gains (habitat protection increased from 1.8% to over 85%) while maintaining cultural practices.[43]

23.3 The Raukūmara Pae Maunga Project is a leading Aotearoa example of Indigenous co-management in action. A partnership between Ngāti Porou, Te Whānau-ā-Apanui and the Crown, the Raukūmara project is a large-scale ecosystem restoration initiative grounded in mana motuhake, mātauranga Māori, and kaupapa-led action. It seeks to remove browsing pests including deer and goats from the Raukūmara Forest, not for economic gain but to uphold tribal responsibilities to te taiao and future generations. This is not conservation by default, but a deliberate assertion of Indigenous governance to reverse the ecological damage of colonisation and restore a degraded maunga.

23.4 Te Tira Whakamātaki supports this model as a proven, values-aligned alternative to outsourcing conservation responsibilities to recreational hunting groups or commercially motivated entities. The Raukūmara Pae Maunga approach offers a credible model for pest control that does not rely on legal protections for invasive species, it restores ecosystems while restoring relationships.

23.4 Collectively these models emphasise holistic approaches incorporating seasonal and spiritual restrictions, community-based monitoring, and intergenerational knowledge transfer, approaches that could honour both mātauranga Māori and sustainable management principles without compromising national park integrity.

Recommendations

24. Te Tira Whakamātaki recommends that the Environment Select Committee:

24.1 Reject the Bill in its entirety. Do not proceed with legislation that removes extermination obligations from the National Parks Act or legalises permanent protection of introduced species in national parks.

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[43] Lamb CT, Willson R, Richter C, Owens-Beek N, Napoleon J, Muir B, McNay RS, Lavis E, Hebblewhite M, Giguere L, Dokkie T, Boutin S, Ford AT. (2022). Indigenous-led conservation: Pathways to recovery for the nearly extirpated Klinse-Za mountain caribou. *Ecol Appl*. 32(5), e2581. doi: 10.1002/eap.2581 www.pubmed.ncbi.nlm.nih.gov/35319140/

24.2 Maintain section 4(2)(b) of the National Parks Act 1980 without exception. Uphold the fundamental principle that national parks exist to protect indigenous biodiversity.

24.3 Repeal or reform the 'Herds of Special Interest' mechanism in the Game Animal Council Act, which elevates recreational interest groups above conservation priorities and creates structural conflicts of interest.

24.4 Disestablish the Game Animal Council and move their activities into the Department of Conservation.

24.5 Require full environmental and cultural impact assessments for any wildlife management decisions affecting Treaty settlement lands, national parks, or World Heritage sites, with mandatory mana whenua consent.

24.6 Explore alternative management approaches that could accommodate hunting interests without compromising conservation obligations, including translocation to private land, controlled breeding outside protected areas, and Indigenous co-management models.

24.7 Require comprehensive World Heritage impact assessment before any HOSI designation in Te Wāhipounamu, given New Zealand's international obligations under the UNESCO World Heritage Convention to protect Outstanding Universal Value and eradicate invasive species where possible.

Conclusion

25. This Bill represents an unprecedented retreat from conservation and Treaty principles, protecting an introduced species, sometimes under an appropriated name, at the cost of Indigenous ecosystems. It removes independent oversight and hands national park management to an interest group that does not represent the public, the scientific community, or iwi.

26. We acknowledge that hunting has a place in Aotearoa, and that hunters can be valuable conservation allies. But our national parks are not hunting estates, they are sanctuaries. The scientific evidence is unequivocal, even the "success story" of Fiordland wapiti management shows that browse pressure remains higher than in areas with near-total deer removal, confirming that any permanent presence of these species continues harming taonga ecosystems.

27. The Minister's prejudicial statements about economic benefits confirm this is about commodifying conservation land rather than protecting ecosystems. While alternative management approaches exist that could balance cultural and recreational values with ecosystem protection, this Bill instead chooses the path of least resistance, abandoning conservation principles established over 70 years.

28. Te Tira Whakamātaki urges the Committee and the public to reject this Bill in its entirety and uphold the values of mana, kaitiakitanga, and ecological integrity that should guide stewardship of Aotearoa's unique indigenous heritage for future generations. New Zealand's international reputation and obligations under the World Heritage Convention are at stake, we cannot be the nation that chooses recreational hunting over the "Outstanding Universal Value" that makes Te Wāhipounamu globally significant.

29. The scientific evidence is unequivocal, the cultural appropriation is unconscionable, and the legal precedent is dangerous. This Bill must be rejected completely.

30. We ask to present on this in person.

Nā mātou,

Melanie Mark Shadbolt

Tumu Whakarae, Chief Executive Officer

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