

**To:**

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



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

Whatungarongaro te tāngata, toitū te taiao

**From:**

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## **Executive Summary**

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

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

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

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

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

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

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

## **1. Introduction**

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

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

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

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

## **2. Core Legal and Conservation Concerns**

### *2.1 Contradiction with National Park purposes and World Heritage obligations*

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

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

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

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

### *2.2 The Draft Plan embeds hunting priorities rather than conservation priorities*

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

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

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

### *2.3 Ecological evidence demonstrates severe and ongoing harm*

The supporting documents confirm:

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

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

### *2.4 Recreational hunting and hybrid selection do not deliver ecological recovery*

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

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

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

### **3. Ecological Evidence of Harm in Fiordland**

#### *3.1 Forest ecosystems*

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

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

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

#### *3.2 Alpine herbfields and sensitive alpine ecosystems*

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

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

These ecosystems recover only with significant reductions in ungulate density.

### *3.3 Wilderness values at risk*

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

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

## **4. Treaty of Waitangi and Cultural Concerns**

### *4.1 Failure to uphold Treaty partnership and Ngāi Tahu rangatiratanga*

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

The Draft Plan:

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

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

### *4.2 Cultural responsibilities to protect taonga species*

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

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

## **5. Concerns with Governance and Process**

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

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

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

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

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

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

### *5.3 International reputation risks*

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

## **6. Alternative Approaches**

Te Tira Whakamātaki supports:

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

Fiordland requires ecological intervention, not enhancement of browsing populations.

## **7. Recommendations**

Te Tira Whakamātaki recommends that:

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

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

## **8. Conclusion**

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

Wapiti red hybrids are invasive ungulates that continue to degrade forest and alpine ecosystems. Their management must prioritise ecological recovery, not recreational outcomes. The Herd of Special Interest framework is fundamentally incompatible with the purpose of national parks and the values of Te Wāhipounamu.

Te Tira Whakamātaki urges the Minister to reject this proposal and to work with Ngāi Tahu and Māori conservation organisations to restore Fiordland's mauri and uphold our shared responsibilities to future generations.

Nā mātou

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Tumu Whakarae, Chief Executive Officer

Te Tira Whakamātaki