

To:

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



Submission on the Sika Herd of Special Interest Draft Herd Management Plan

Whatungarongaro te tāngata, toitū te taiao

From:

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Executive Summary

1. Te Tira Whakamātaki opposes the designation of a Sika Herd of Special Interest and the Draft Herd Management Plan in full.
2. The proposal represents a significant shift away from conservation first principles and toward a model that privileges recreational hunting and commercial outcomes on public conservation land. This shift threatens biodiversity, erodes Treaty responsibilities, and undermines the purpose and integrity of the conservation estate.
3. The proposed management plan relies on legislative changes that have been widely criticised by scientific experts, political parties, and the New Zealand Conservation Authority. The select committee report on the Herds of Special Interest Amendment Bill confirms this legislation removes key conservation safeguards and creates unresolved conflicts between hunting interests and conservation obligations.
4. Sika deer are an introduced species responsible for extensive ecological damage. DOC's own documents acknowledge widespread browsing impacts, compromised canopy regeneration, and long-term degradation in both Kaimanawa and Kaweka Forest Parks.
5. The plan elevates hunting outcomes above ecological restoration and above the responsibilities that iwi and hapū carry as kaitiaki. The approach described in the plan is inconsistent with mātauranga, whakapapa centred environmental practice, and the values held by many mana whenua who express deep concern about degraded ngahere, declining taonga species, and reduced ability to exercise kaitiakitanga.
6. The plan does not deliver credible conservation outcomes. It lacks measurable ecological targets, relies on the same recreational hunting approaches that have already failed to restore forest health, and sets out an adaptive management structure that prioritises herd quality and hunting satisfaction rather than ecosystem integrity.
7. Te Tira Whakamātaki recommends that the proposed designation is not progressed, that the Draft Plan is withdrawn, and that the Crown instead works with mana whenua to develop Indigenous led approaches to ungulate management that restore ecosystem function and whakapapa-based relationships, rather than perpetuating colonial hunting frameworks.

1. Introduction

Te Tira Whakamātaki is an independent Māori environmental organisation focused on kaitiakitanga, biosecurity, and the protection of Aotearoa's taonga species and ecosystems. Our work supports iwi, hapū, and Māori communities to exercise rangatiratanga over lands, waters, and biodiversity.

We oppose the Draft Herd Management Plan because it represents another step in the wider Herds of Special Interest programme that we opposed in our submission to the Environment Committee on the Game Animal Council (Herds of Special Interest) Amendment Bill. That submission detailed the ecological, legal, and cultural risks of introducing mechanisms that give formal protection to invasive deer within the conservation estate. Those same concerns apply to this plan and are magnified by the scale of the area proposed for designation.

2. Core Legal and Conservation Concerns

2.1 The plan's foundation conflicts with conservation law and purpose

The select committee report confirms that Herds of Special Interest require explicit legislative amendments to override the National Parks Act requirement to exterminate introduced species as far as possible. This shows that the HOSI model is structurally incompatible with conservation principles.

Kaimanawa and Kaweka Forest Parks are held for the primary purpose of protecting native ecosystems for present and future generations. Introducing a hunting-based management framework into these areas undermines these statutory purposes and erodes the role of the New Zealand Conservation Authority by shifting decision making to the Minister for Hunting and Fishing.

2.2 Hunter led management cannot achieve ecological recovery

DOC's own material confirms that sika have caused major shifts in vegetation structure, including the replacement of palatable understorey by unpalatable species and the failure of canopy regeneration at multiple sites.

Research and operational experience show that recreational hunting alone is unable to reduce deer populations to levels necessary for forest regeneration. The Kaweka Mountain Beech Project demonstrated that only intensive aerial control resulted in canopy closure within ecologically meaningful timeframes, while recreational hunting resulted in very slow or no regeneration despite decades of effort

The Draft Plan does not set ecological density thresholds, regeneration requirements, or browse limits. Instead, it focuses on maintaining low but persistent populations of sika to

improve the hunting experience. This approach is inconsistent with ecological restoration and even with the department's own description of the impacts of deer.

2.3 The plan sets out a hunting strategy rather than a conservation strategy

The plan's objectives centre on:

- enhancing the sika hunting experience
- improving herd quality
- ensuring older male stags are available for trophy hunting
- generating revenue and sponsorships
- promoting hunter tourism

These objectives are embedded throughout the plan's strategies. They do not align with conservation outcomes, nor do they satisfy the legislative requirement to give effect to Treaty principles.

The plan formally embeds industry priorities into conservation governance by directing DOC and mana whenua to work with the Game Animal Council and the Central North Island Sika Foundation to deliver herd quality improvements and hunting access opportunities.

3. Ecological Evidence of Harm

3.1 Sika deer continue to degrade forest health

The documents acknowledge:

- widespread loss of palatable species
- long term suppression of canopy regeneration
- high densities of sika in remote areas due to limited hunter access
- high levels of browsing damage indicated by monitoring data
- slow and costly recovery processes that require intensive control, not population maintenance

Ecological monitoring methods proposed in the plan, such as seedling ratio index and permanent plot monitoring, are essential for tracking harm. Yet the plan does not commit to achieving ecological improvements. It aims only to demonstrate whether the herd management approach is being delivered, not whether ecosystems are recovering.

3.2 The plan institutionalises ongoing ecological damage

Maintaining a male biased population for hunter satisfaction and trophy quality ensures a permanent browsing footprint across the Sika Area. The plan itself acknowledges that

even low-density sika populations can prevent regeneration of preferred species in deer accessible sites.

This contradicts conservation science, climate resilience planning, and obligations to protect native species that evolved without ungulates.

4. Treaty of Waitangi and Cultural Concerns

4.1 The plan does not uphold Treaty principles

The plan acknowledges mana whenua interests but does not provide shared authority or decision-making power. Instead, iwi and hapū are invited to participate in a framework already designed to achieve herd and hunting outcomes.

This is inconsistent with section 4 of the Conservation Act, which requires the Crown to give effect to Treaty principles, including tino rangatiratanga, active protection, and partnership.

The select committee report also highlights that the amendment bill weakens the role of the NZCA, a key body for ensuring public interest and protecting Treaty related conservation responsibilities

4.2 The plan perpetuates colonial conservation structures

Te Tira Whakamātaki has consistently argued that approaches to invasive species must align with whakapapa-based responsibilities and Indigenous knowledge systems. A hunting driven approach that protects an invasive ungulate in areas of cultural significance undermines these responsibilities.

Mana whenua have expressed deep concern about the degraded state of these forests and the impacts of deer on taonga species. The plan does not address these concerns. Instead, it continues the colonial tradition of entrenching introduced species for recreational use on Indigenous land without Indigenous consent.

5. Concerns with Governance and Process

5.1 The enabling legislation lacks an evidence base

The disclosure statements reproduced in the select committee report confirm that the Bill had no inquiry based or research-based foundation. There was no impact analysis, and no scientific or conservation rationale provided for advancing the HOSI mechanism. This is an extraordinary departure from evidence based environmental policy making.

Building the Sika Herd Management Plan on this legislative foundation produces the same weaknesses, conflicts, and governance failures.

5.2 Conflicts with DOC's conservation responsibilities

The Green Party dissenting view highlights significant operational conflicts for DOC, including challenges with pest control tools, deer repellent use, and the risk that conservation operations might be restricted to protect hunting interests. This introduces unacceptable risks to climate resilience, biodiversity protection, and DOC's ability to act as kaitiaki on behalf of the public.

6. Alternative Approaches

Indigenous led conservation models already exist in Aotearoa, including the Raukumara Pae Maunga approach and the principles within Maranga Ake Ai. These models restore ecological health while restoring relationships, and they demonstrate the success of Indigenous governance rather than industry led frameworks.

Translocation, controlled breeding outside the conservation estate, and reduced densities of deer across forest parks are all viable alternatives that align with conservation priorities rather than replacing them.

7. Recommendations

Te Tira Whakamātaki recommends that:

- 7.1. The Minister for Hunting and Fishing does not designate a Sika Herd of Special Interest.
- 7.2. The Draft Herd Management Plan is withdrawn.
- 7.3. The Crown reaffirms the purpose of Kaimanawa and Kaweka Forest Parks as conservation lands where introduced browsers are reduced to protect native ecosystems.
- 7.4. Any future ungulate management frameworks are grounded in Treaty partnership and mātauranga Māori, with shared authority and decision making for mana whenua and honour existing treaty settlements.
- 7.5. The Herds of Special Interest mechanism developed under the Game Animal Council Act is repealed or significantly reformed to align with conservation law, Treaty obligations, and science based ecological management.
- 7.6. Conservation funding is restored and strengthened, given the biodiversity crisis identified in submissions to the select committee.
- 7.7. Full World Heritage impact assessments are required before any proposal that alters management of conservation land in ways that elevate introduced species

8. Conclusion

The Draft Sika Herd of Special Interest Management Plan represents an unprecedented departure from established conservation principles, ecological evidence, and Treaty responsibilities. It proposes to manage an invasive browser for hunting and commercial gain within protected forests that already show significant signs of ecological degradation.

The supporting legislative framework has been widely criticised for its lack of evidence, erosion of conservation safeguards, and conflicts with democratic oversight and Indigenous rights. The plan itself fails to deliver meaningful environmental protections and instead embeds a hunting centric management approach that will prolong and deepen ecological harm.

Te Tira Whakamātaki urges the Crown to uphold kaitiakitanga, tikanga, and the responsibilities of Tiriti partnership by rejecting this plan and working with mana whenua to design Indigenous led approaches that heal both ecosystems and relationships.

Nā mātou

Melanie Mark Shadbolt

Tumu Whakarae, Chief Executive Officer

Te Tira Whakamātaki