



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

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To Department of Conservation

## Submitter details

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

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## Parliamentary Commissioner for the Environment

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

## Submission

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

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

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

I would make the following observations about the consultation document:

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

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

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

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

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

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



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

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

<sup>2</sup> National Parks Act (1980, s4(2)(b)) states: “except where the Authority otherwise determines, the native plants and animals of the parks shall as far as possible be preserved and the introduced plants and animals shall as far as possible be exterminated.”