



# Feedback on the Draft Herd Management Plan for proposed Kaweka and Kaimanawa Sika 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 this Draft Herd Management Plan for Kaweka and Kaimanawa Sika 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 sika, amongst other priorities, DOC proposes to give hunters a formal role in controlling the population. In exchange, hunters will have a greater say over 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 sika population and indigenous biodiversity are missing, as are the actual known impacts of control efforts.
- This document is filled with vague language. It sets out an ‘approach’. One of the objectives is to “**seek** to generate in-kind support, and revenue through partnerships and

sponsorships, to **contribute to** the cost of delivering this Plan” [emphasis added]. Similarly, under research: “**seek** opportunities to undertake or support research relevant to the management of sika and/or their effects within the Sika Area.” There is a lot of ‘seeking’ going on in this plan – and yet there is also almost no clear 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 Sika 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 seeking a determination from the New Zealand Conservation Authority within the existing system offers a simpler way forward than creating a HOSI. The advantage of going through the Authority is that it preserves the prioritisation of conservation.



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