



**Environment Select Committee**

[en.legislation@parliament.govt.nz](mailto:en.legislation@parliament.govt.nz)

**RE: Submission to Game Animal Council (Herds of Special Interest)**

**Amendment Bill**

Closing date of Submission: 24 July 2025

To the Environment Select Committee,

New Zealand Fish and Game Council have similar conservation and recreational goals as Game Animal Council as managers of Valued Introduced Species.

The New Zealand Fish and Game Council supports the submission from the Game Animal Council to the Game Animal Council (Herds of Special Interest) Amendment Bill.

Although the Bill focuses on big game animals, it raises broader questions about the recognition of other introduced species, including trout, salmon and game birds.

Fish & Game is concerned that opposition to the Bill could set a precedent that puts these species at risk.

Fish & Game would also like to submit that the appropriate agency for the Management of Herds of Special Interest should be vested in statute with the Game Animal Council.

As the only organisation with a focus on big game animal management, and the statutory functions of:

- representing the views of the hunting sector;
- directly advising the Minister on game animal management; along with the
- provision of education resources; and
- mana whenua and community engagement and collaboration; and c

Along with consisting of representatives of the hunting community, the GAC, is eminently more suited to be the managers of Herds of Special Interest than the Department of Conservation.

We do wish to be heard in relation to the attached submission.

### **Contact Details**

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Attached – Game Animal Council submission

24 July 2025

Committee Secretariat  
Environment Committee  
Parliament Buildings  
Wellington

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## **Submission: Game Animal Council (Herds of Special Interest) Amendment Bill**

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### **Executive summary**

1. The New Zealand Game Animal Council (GAC) supports the intention of the Game Animal Council (Herds of Special Interest) Amendment Bill 2025 (the Bill).
2. The Game Animal Council Act 2013 (GACA) was designed to create a balanced approach to conservation that incorporates the principle of sustainable use regarding game animals. It acknowledges the value of game animals and aims to improve their management, to achieve both hunting and conservation outcomes.
3. To fulfil the potential of the GACA, herds of special interest (HOSI) should be supported by all parts of the conservation policy framework, and be able to be established throughout the country, including in national parks. This would ensure:
  - a. Legal and policy consistency with the original design of the GACA.
  - b. Public support for conservation through inclusive, community-based management.
  - c. Tangible social, economic, and biodiversity benefits that serve all New Zealanders.

4. The Bill is not just a legislative adjustment; it is a vital step toward aligning the GACA with the intention of those who enacted the Act. The Bill will enhance collaborative conservation management and acknowledge the values hunters hold for national parks.
  5. The proposed amendment is supported, and we have identified several additional changes to the GACA that are necessary to ensure consistency and effective implementation. The proposed changes will further help achieve the intent of the Bill.
  6. We request that the select committee proceed with the Bill, incorporating the amendments outlined below.
  7. **The Game Animal Council request to be heard by the Environment Select Committee on this Bill.**
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### **About the New Zealand Game Animal Council**

8. The GAC, established under the GACA, is a statutory entity with responsibilities for, among other things:
  - Advising and making recommendations concerning game animals, hunting , and the views of the Hunting Sector, to the Minister for Hunting and Fishing (previously Minister of Conservation).
  - Raising awareness of the views of the hunting sector.
  - Liaising with Mana Whenua, the Department of Conservation (DOC), and private landowners to enhance game animal management and hunting practices.
  - Managing HOSI, in accordance with Ministerial delegations, in a way that is compatible with the management of public conservation land and resources.
9. We are a collaborative organisation and prioritise ground-up conservation and game animal management efforts. We value place-based relationships and recognise the value of working with iwi, hapū and communities to achieve conservation and hunting outcomes.

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## Why the reforms matter

10. Hunting is an integral part of New Zealand's identity, weaving together our cultural heritage and the stewardship of our natural resources. Hunters play a crucial role in effective conservation, by maintaining a balanced ecosystem and promoting biodiversity. This submission is supported by the expert opinions of Dr Ken Hughey, Dr Graham Nugent and Gary Ottmann. They are all eminent and respected leaders in the field of game animal management and conservation, and their opinions are attached as Appendix A.
11. There is a misconception that hunters and conservationists are at odds. However, both parties share a strong commitment to the health and future of our whenua, waterways, and wildlife. Their motivations may differ, but their goals often align: thriving ecosystems, balanced species management, and public access to the conservation estate<sup>1</sup>.
12. Hunters are not merely recreationalists; they are passionate conservationists who are dedicated to the sustainable use of our natural resources. Through responsible hunting practices, they actively contribute to the management of game populations, preventing overpopulation and habitat degradation. This hands-on involvement helps safeguard native species and habitats, fosters a connection to our whenua, instils respect for wildlife, and promotes an appreciation for the outdoors.
13. The skills and knowledge that hunters possess can greatly aid conservation efforts, providing insights into animal behaviour, population dynamics, and ecosystem health. The contribution hunters offer often goes unrecognised in the current conservation framework, which tends to overlook the collaborative potential between hunting communities and conservation organisations.
14. Appendix B contains four case study examples different types of game animal management on conservation land in New Zealand. The examples with the best conservation and recreational outcomes are those that are hunter led.
15. A great example of the conservation value of hunters is the Fiordland Wapiti Management programme. This programme serves as the foundation for the HOSI system. In 2004, the Fiordland Wapiti Foundation advocated for, and secured, the right to manage the impacts of wapiti deer as part of the Fiordland National Park Management Plan review<sup>2</sup>. The Foundation culled several hundred deer within Fiordland National Park to set up the sustainable management of the wapiti herd. This marked a new era in hunter-led conservation in New Zealand<sup>3</sup>. While their primary objective is deer management, the Foundation undertakes other conservation projects within Fiordland, such as stoat trapping<sup>4</sup>. The Foundation's conservation efforts are primarily funded by hunters, which will also be true when the proposed wapiti HOSI is established and managed.

16. The Fiordland wapiti example shows how partnerships between hunters and conservationists can effectively and sustainably manage game animal populations while achieving conservation and biodiversity protection outcomes. It also shows how DOC is working with hunters on the ground to pragmatically achieve good outcomes, rather than strictly following the letter of outdated law.
17. Existing conservation law is outdated and predates the GACA and its modern approach to conservation. The GACA envisaged a conservation approach that is based on multiple values – not just the traditional purist values that are prevalent in outdated conservation laws and strategies. To achieve effective and inclusive conservation, hunting needs to be integrated into our conservation narratives. Recognising the contributions of hunters can enhance community support for conservation initiatives, reflecting the diverse values that New Zealanders hold regarding our natural environment. By engaging hunters as partners in conservation, we not only harness their expertise but also embody a more comprehensive approach to environmental stewardship.
18. We welcome the intention of the Minister to update the GACA to better provide for HOSI in national parks and want to signal that reform to the New Zealand conservation framework is urgently needed.
19. We ask to be a part of discussions about modernising the conservation framework to ensure the interests of hunters, and the benefits they bring to the community and environment, are respected and reflected.

## **Parliamentary intent in establishing the Game Animal Council and HOSI (2013)**

### **Fundamental basis**

20. The GACA is a modern and robust framework for the sustainable management of game animals, specifically deer, tahr, chamois, and wild pigs, through the establishment of an independent statutory body, the GAC. This recognises the ongoing presence of these species on public conservation land, their value to New Zealanders, and the need for more professional, structured management.
21. The GACA addresses many of the historic tensions between conservation goals and hunting interests. The framework is practical rather than ideological and seeks to

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<sup>1</sup> Department of Conservation, & Game Animal Council. (n.d.). Te ara ki mua: A framework for adaptive management of wild goats, deer, wild pigs, tahr, and chamois. Retrieved July 24, 2025, from <https://www.doc.govt.nz/globalassets/documents/conservation/biodiversity/te-ara-ki-mua-framework.pdf>

<sup>2</sup> Fiordland Wapiti Foundation. (n.d.). About the Fiordland Wapiti Foundation. Retrieved July 24, 2025, from <https://fwf.net.nz/about-us/>

<sup>3</sup> NZ Game Animal Council. (2025). Wapiti HOSI. <https://nzgameanimalcouncil.org.nz/wapiti-hosi/>

<sup>4</sup> Department of Conservation. (n.d.). Fiordland Wapiti Foundation: Regional partnerships. Retrieved July 23, 2025, from <https://www.doc.govt.nz/about-us/our-partners/our-regional-partners/fiordland-wapiti-foundation/>

integrate game animal management with biodiversity protection in a way that reflects the New Zealand landscape and meets public expectations.<sup>5</sup>

### Context

22. The protection of New Zealand's unique biodiversity requires collective community support for conservation management. Recognition, respect and integration of the full spectrum of New Zealand's values will build community support.
23. Many people in New Zealand value the sustainable use of our natural resources and do not support conservation efforts that lead to the exclusion of valued introduced animals, like deer, tahr, chamois, and wild pigs. People who value sustainable use support conservation when it means that valued introduced species<sup>6</sup> are appropriately protected and managed for their recreational, community, and economic benefits (Figure 1).

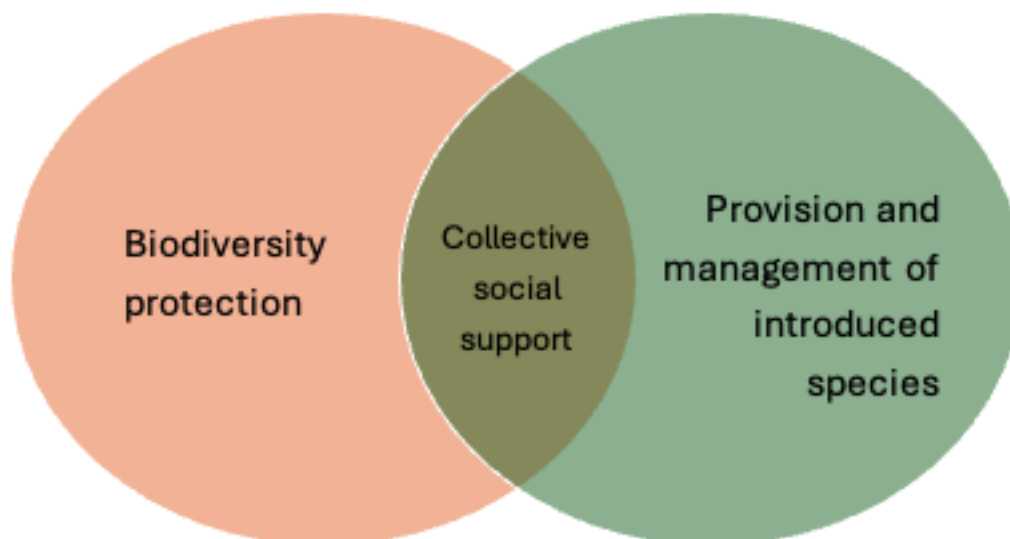


Figure 1 Relationship between biodiversity protection and introduced species

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<sup>5</sup> New Zealand Parliament. (2013). Game Animal Council Bill — Second Reading - New Zealand Parliament. [https://www.parliament.nz/en/pb/hansard-debates/rhr/document/50HansD\\_20131120\\_00000008/game-animal-council-bill-second-reading](https://www.parliament.nz/en/pb/hansard-debates/rhr/document/50HansD_20131120_00000008/game-animal-council-bill-second-reading)

<sup>6</sup> Valued introduced species includes sports fish, game birds and animals and species introduced for biocontrol, which provide recreational, economic, environmental or cultural benefits to society.

Department of Conservation. (2020). Te Mana o te taiao: Aotearoa New Zealand Biodiversity Strategy 2020. Department of Conservation. p 63

**Sustainable use values** are the benefits we get from taking care of our natural resources in a way that protects wildlife and natural areas. This approach helps ensure that we have good outcomes for the environment, culture, recreation, and the economy for current and future generations.

24. Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy 2020 (ANZBS) recognises this fundamental requirement:

*Reaching a balance to ensure that valued introduced species continue to provide the benefits they are valued for, while also ensuring that indigenous biodiversity thrives, is a key challenge for Aotearoa New Zealand<sup>7</sup>.*

25. The ANZBS recognises and prioritises our duty to protect indigenous species. It also acknowledges that some introduced species provide benefits for recreation, economic, cultural, and human needs, which require a different management approach.
26. The ANZBS aims to balance the positive impacts of introduced species like game animals and sports fish with environmental protection, encouraging all New Zealanders to support biodiversity efforts.
27. For game birds and fish, the Wildlife Act 1953 enables sustainable use through the New Zealand Fish and Game Council. However, managing other introduced game animals is less clear. The Wild Animal Control Act 1977 recognises the need for a unique management approach for introduced game species, but does not fully acknowledge the benefits of hunting, like community involvement and economic gain.
28. Hunters play a crucial role in controlling game animal populations, harvesting more than 350,000 big game animals annually (including deer), which exceeds government 'pest control' efforts<sup>8</sup>. Game animals are largely unmanaged beyond the contribution of the hunting community (**Error! Reference source not found.**). There are no natural predators for game animals, so populations can increase quickly when conditions are right<sup>9</sup>.

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<sup>7</sup> Department of Conservation. (2020). Te Mana o te taiao: Aotearoa New Zealand Biodiversity Strategy 2020. Department of Conservation. p 31

<sup>8</sup> Kerr, G. N., & Abell, W. (2014). Big game hunting in New Zealand: per capita effort, harvest and expenditure in 2011–2012. *New Zealand Journal of Zoology*, 41(2), 124–138. <https://doi.org/10.1080/03014223.2013.870586>

<sup>9</sup> Department of Conservation, & Game Animal Council. (n.d.). Te ara ki mua: A framework for adaptive management of wild goats, deer, wild pigs, tahr, and chamois. Retrieved July 24, 2025, from <https://www.doc.govt.nz/globalassets/documents/conservation/biodiversity/te-ara-ki-mua-framework.pdf>

29. Hunters contribute to biodiversity protection, food donations, and community and conservation initiatives. Hunters value access to game animals for a multitude of reasons, including: recreation, food gathering, cultural connection, skill development, and the enjoyment of wild places. For them, deer, pigs, tahr, and chamois are valued resources to be respected, pursued, and harvested sustainably.
30. Hunters and conservationists are often seen as opposites, but they share common aspirations for protecting nature—driven by different motivations, but united in purpose. Current conservation law and policy do not recognise these different motivations or values that people hold for conservation land. Current conservation policy relies on hunting as a pest-control mechanism but does not align with the reasons people choose to hunt.

***The burden on hunters.***

*Managing game animals in New Zealand relies on the support of hunters.*

*Hunting is currently only permitted to reduce or eliminate the very animals hunters seek to access. This disregards the values that underpin their use and enjoyment of public conservation land.*

*Hunters advocate for conservation approaches that include responsible game management and foster sustainable outcomes that benefit biodiversity and the hunting community.*

31. The reliance of conservation policy on hunters for pest control places an inappropriate burden on that community. It asks hunters to be a part of the conservation solution without recognising and providing for their values. The GACA aimed to address this issue by aligning game management with biodiversity protection.

**Provision of HOSI**

32. A key feature of the GACA is the creation of Herds of Special Interest (HOSI). This mechanism enables game animal management while protecting biodiversity on public conservation lands. It aims to support hunting while preserving conservation values.
33. The HOSI was developed through years of policy development, Select Committee scrutiny, and extensive sector consultation.
34. The GACA outlines that HOSI focuses on herds that are highly valued by hunters within defined areas on public conservation land. The GACA also ensures HOSI management is compatible with the management of public conservation land and resources. The GAC can manage HOSI on behalf of the Minister.

35. HOSI provides a path to recognise the range of values the public holds for New Zealand conservation land. Through HOSI, the Crown, mana whenua, the Game Animal Council, and other stakeholders can collaboratively manage highly valued game animal herds in a way that:
- Protects biodiversity values;
  - Maintains recreational, cultural, and commercial hunting opportunities;
  - Recognises the food security and social benefits provided by game animals;
  - Ensures ecological sustainability through population controls.
36. HOSI are designed to focus on herds that hunters highly value in specific areas – recognising that the value of game animals differs depending on the species and location. HOSI currently only apply to public conservation land, not private land.
37. Two applications to designate HOSI have been submitted to date: Sika Deer (Kaimanawa and Kaweka Forest Parks) and Wapiti Deer (Fiordland National Park). Both applications demonstrate the expected benefits to conservation efforts. DOC's assessment of the Central North Island Sika Foundation HOSI application concluded the proposal would improve both habitat and animal health in the Kaimanawa and Kaweka Forest Parks. The primary objectives of the Sika HOSI proposal are:
- 1 Reduce animal numbers down to a level that is compatible with sustainable forest canopy regeneration, and
  - 2 Enhance hunter participation in herd management and enhance hunter satisfaction with sika venison quality and the overall sika hunting experience.
38. The management objectives of the Wapiti HOSI include:
- Maintain wapiti herd numbers at a level that enables and promotes the regeneration of browsed indigenous plants.
  - Enhance the experience associated with hunting wapiti.
  - Build strong local partnerships that can contribute to the management of the herd.
39. These objectives show how conservation and hunting values can be provided for in tandem through the HOSI mechanism.

## HOSI in national parks

40. The tensions between conservation legislation and hunting interests are particularly evident in the management of game animal populations within national parks.
41. The National Parks Act 1980 (NPA) has two main purposes<sup>10</sup>:
  - a. To maintain parks in their natural state preserved in perpetuity for their intrinsic worth and:
  - b. To ensure the public has the right of entry, preserved in perpetuity for their benefit, use, and enjoyment.
42. Currently, game animals are only referenced in terms of extermination in the NPA<sup>11</sup>, despite them being part of the use and enjoyment of the parks for many New Zealanders. The extermination requirement achieves the first purpose of national parks but fails to achieve the second purpose for game animals and the hunting community. This perception and treatment of game animals in national parks is contradicted by the more recent GACA.
43. The GACA provides for designating HOSI in national parks – recognising that game animal management and biodiversity protection can coexist. Certain herds that are expected to be subject to an application to be designated as HOSI, such as Fiordland wapiti and Himalayan tahr, are located wholly or partly within National Parks. The distribution of these populations would have been clear when the GACA was established.
44. The Bill seeks to clarify that HOSI can be designated within national parks by amending section 16 of the GACA. It proposes that section 4(2)(b) of the NPA does not apply to a HOSI that is designated in a national park. To avoid doubt, the amendment also states that section 4(2)(b) of the NPA does not limit the Minister of Conservation's power to designate a herd of special interest.
45. Not providing for HOSI within national parks would contradict the original legislative intent and hinder effective management of valued herds.<sup>12</sup>
46. Game animals existed within New Zealand's national parks before the NPA was enacted in 1980. This is despite a legal provision that calls for the eradication of introduced species from National Parks (as far as possible).<sup>13</sup>

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<sup>10</sup> National Parks Act 1980. s 4(1)

<sup>11</sup> National Parks Act 1980. s 4(2)(b)

<sup>12</sup> Department of Conservation. (2025). Briefing: Sika HOSI proposal.

<https://www.doc.govt.nz/globalassets/documents/about-doc/oia/2025/25-b-0097-briefing-sika-hosi-proposal.pdf>

<sup>13</sup> National Parks Act 1980. s 4(2)(b)

47. Unlike non-beneficial introduced species, game animals are important to hunters and contribute to the recreational and economic value of National Parks. Highly valued species have cultural, recreational, and economic significance, and their presence reflects a long-standing public use of National Parks. The sustainable management of valued herds achieves the secondary purpose of National Parks by providing for the benefit, use, and enjoyment of these areas.
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### **Why HOSI in National Parks is good for New Zealand**

48. Allowing for Herds of Special Interest in National Parks represents a new way of thinking about conservation. It shows that protecting biodiversity and managing game animals sustainably can go hand in hand.

### **Economic benefits**

49. Hunting (recreational and commercial) valuable game animals can bring millions into regional economies, especially in remote areas with limited alternative income sources.
50. Hunters spend approximately \$300 million annually on hunting-related expenses.
51. Both domestic and international visitors travel to hunt, which supports local businesses, including hotels, transportation services, outdoor retailers, and other service industries.
52. In his expert evidence, Professor Emeritus Kerr states that recreational hunting supports approximately 2,500 jobs in New Zealand. In addition, the guided hunting sector directly employs more than 530 people and generates over \$100 million in annual foreign sales (Appendix C).
53. On an individual basis, Kerr states that hunters generally receive benefits from their hunt that exceed the costs of the hunt. This consumer surplus increases with the quality of the game animal population (e.g. trophy potential). More detail about consumer surpluses in hunting is provided in Appendix C.

### **Community and food security**

54. Game animals are an important source of protein for rural and low-income communities.
55. There is a growing interest in sustainable, wild-harvested meat. Using taxpayer money to remove a reliable source of high-quality protein undermines public benefit.

### **Cultural and social wellbeing**

56. For many Māori, game animals serve as a substitute for taonga species, fostering a deep connection to the whenua, kai and whakapapa that have been restricted or banned from harvest under the Wildlife Act 1953.

57. For many long-standing New Zealand families, these herds symbolise their intergenerational connections to the environment, food sovereignty and economic opportunity.
58. Recreational hunting also promotes mental health, physical activity, whanaungatanga, and participation in traditional outdoor skills.

### **Conservation and active management**

59. Hunters are among the most active conservation volunteers in the country, undertaking predator and pest control, weed removal, track maintenance, meat donation, and ecosystem monitoring—often at their own cost and in partnership with conservation agencies.
  60. Research suggests that hunters remove more than 350,000 game animals annually, far exceeding the number removed by government-based control efforts.
  61. The management of the quality and quantity of game animals harvested by hunters has the potential to offer more effective control than an expansion of government control efforts (Appendix C).
  62. Structured HOSI management means hunters can better contribute to conservation management and increases science-based monitoring of ecosystem health.
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### **Comment on the Game Animal Council (Herds of Special Interest) Amendment Bill 2025**

63. The Game Animal Council (Herds of Special Interest) Amendment Bill 2025 seeks to resolve a legal inconsistency between the Game Animal Council Act 2013 and the National Parks Act 1980. Currently, the National Parks Act states that introduced animals should be exterminated 'as far as possible'<sup>14</sup>.
64. The goal for national parks is to restore their ecosystems to their original state, which involves removing invasive species deemed harmful to natural ecosystems. The term 'natural state' is defined in conservation policies as an environment unchanged by human activity or introduced species<sup>15 16</sup>.

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<sup>14</sup> National Parks Act 1980. s 4(2)(b)

<sup>15</sup> Department of Conservation. (2005). General policy for national parks. Department of Conservation. <https://www.doc.govt.nz/documents/about-doc/role/policies-and-plans/general-policy-for-national-parks.pdf>

<sup>16</sup> Department of Conservation. (2005). Conservation General Policy. <https://www.doc.govt.nz/globalassets/documents/about-doc/role/policies-and-plans/conservation-general-policy.pdf>

65. The relationship between public enjoyment and the natural state of national parks is complex and requires thoughtful deliberation. Currently, although the concept of HOSI recognises the conservation value of hunting, conservation policy does not.
66. In New Zealand, national parks are often viewed as pristine, untouched natural areas. However, the reality is more complicated. To allow people to enjoy these parks, infrastructure is built in the form of tracks, huts and campsites. This infrastructure can disturb the environment and is, strictly speaking, inconsistent with the statutory definition of 'natural state'.
67. While conservation laws aim to keep national parks in their natural state, they also recognise that some human activity is necessary for conservation. This is the practical side of conservation, where connecting people with nature is seen as essential to promoting conservation efforts.
68. Hunting is part of the connection, use and enjoyment of national parks. Many hunters appreciate the opportunity to harvest game animals for recreation, food, and cultural reasons. However, hunting is only permitted to reduce or exterminate the very animals hunters seek to access. For most hunters, game animals are valued resources to be respected, pursued, and harvested in a sustainable way.
69. There is work to be done to ensure the HOSI provisions are integrated into conservation legislation and policy in a way that recognises HOSI as a practical, sustainable conservation strategy.
70. The amendment Bill makes it clear that the direction to exterminate introduced species will not apply to animals classified as HOSI, which preserves the integrity of the original GACA and allows it to function as intended.<sup>17</sup>
71. The proposed amendment aligns with Parliament's original vision, ensures statutory consistency, and supports a more modern approach to conservation that includes diverse perspectives.
72. The GAC supports the intent of the proposed changes; however, we would like to propose further amendments to eliminate any confusion about whether designating a HOSI within a National Park is appropriate. It is essential that these herds are properly recognised across conservation legislation and policy, so we can effectively protect both the parks and the wildlife they support.
73. To make it clear that sustainable hunting and game animal management as envisaged by the HOSI and GACA are provided for in national parks, the GACA needs to make it very clear that the HOSI are consistent with the two purposes of national parks in the NPA.

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<sup>17</sup> Game Animal Council (Herds of Special Interest) Amendment Bill 2025 (151-1)

The changes required to achieve this simple goal are set out in more detail in Sections 7 and 8.

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### **Recommendations for further amendments to the GACA**

74. The current Bill does not clearly state that designating a HOSI in national parks aligns with the purposes for which national parks are administered. This lack of clarity creates legal uncertainties and casts doubt over whether the Minister can designate a HOSI within a national park in a way that is workable within the conservation policy framework.

### **Background**

75. In early 2024, the GAC and DOC began working together to create a process for establishing HOSI. This collaboration stemmed from gaps in the existing GACA.
76. The GAC was approached by the Central North Island Sika Foundation and the Fiordland Wapiti Foundation to kick off the first steps in establishing HOSI. They initiated a trial process to explore how to propose and manage these herds, taking a three-phase approach that involves proposing ideas, drafting management plans, and implementing them effectively.
77. During this trial, the GAC discovered several legislative obstacles that hindered the formation and management of these herds. One of these roadblocks is currently being addressed through the proposed amendments to the GACA; however, even with the current Bill, several roadblocks will remain.

### **The designated area for HOSI needs to be practical**

#### Problem statement

78. The GACA only allows for the designation of HOSI on public conservation land, but the game animals do not stay within mapped boundaries.

#### Explanation

79. Subpart 3, section 16(1) sets out that HOSI may only be designated on public conservation land. Private, Māori, or council-owned lands run adjacent to, or create islands within, conservation land where HOSI would be designated.
80. Game animals do not stay within mapped boundaries. Without physical barriers, game animals will cross between land ownership boundaries. Limiting HOSI management to one land ownership will lead to inconsistent and inefficient management.

#### Recommendations

81. To ensure better management of game animals and successful conservation outcomes, we need to adopt a more unified approach that spans all land ownership types.
82. The GAC value our relationships with local communities, iwi and hapū. Where a designated HOSI may cross onto private or Māori land, the GACA should allow flexibility to develop formal agreements in collaboration with the owners and/or their representatives (i.e. Māori land trusts). The agreements would specify what access permissions the land owners are comfortable with, and under which conditions the HOSI can be managed within that land parcel.

### **The concept of 'overriding considerations' needs refining**

#### Problem statement

83. The requirement for HOSI to be consistent with overriding considerations superseding the establishment of the GACA creates unnecessary challenges and makes the Ministers powers to designate HOSI subject to outdated policies, strategies and plans. Importantly, many of the overriding consideration documents were created before the introduction of the GACA and, therefore, the HOSI concept. This means that the documents do not address how to manage HOSI areas or how they relate to conservation lands.

#### Explanation

84. In New Zealand, the conservation legislative framework tries to balance two important ideas: preserving nature and allowing people to use and enjoy public conservation lands. This often leads to a complex situation where the law must find a way to manage conflicting interests. To help with this, there are statutory documents (e.g. management plans) that provide direction on how to navigate these challenges.
85. In the GACA, these statutory guidance documents are referred to as 'overriding considerations'. Under s 4 of the GACA, 'overriding considerations' means:
  - a. *the welfare and management of public conservation land and resources generally:*
  - b. *any statement of general policy that is made, or has effect as if it were made, under—*
    - i. *section 17B of the Conservation Act 1987:*
    - ii. *section 44 of the National Parks Act 1980:*
    - iii. *section 15A of the Reserves Act 1977:*
    - iv. *section 14C of the Wildlife Act 1953:*

- c. *any conservation management strategy made under section 17D of the Conservation Act 1987:*
- d. *any conservation management plan made under—*
  - i. *section 17E of the Conservation Act 1987:*
  - ii. *section 40B of the Reserves Act 1977:*
- e. *any management plan made under—*
  - i. *section 47 of the National Parks Act 1980:*
  - ii. *section 41 of the Reserves Act 1977:*
- f. *any wild animal control plan made under section 5 of the Wild Animal Control Act 1977:*
- g. *any pest management strategy, pest management plan, pathway management plan, or operational plan made under the Biosecurity Act 1993*

- 86. According to case law, 'consistent with' means the designation should match the overall objectives of the policies, strategies, and plans and not contradict them. There must be consistency with the broader environmental goals, but a strict rules-based consistency is not required<sup>18</sup>.
- 87. When the Minister wants to designate a HOSI, they need to align with those overriding considerations and ensure that any management plan for the HOSI aligns with those same principles. This can be difficult because the overriding considerations predate the GACA and HOSI framework and don't account for its goals.
- 88. While the amendment proposed by the Bill will help clarify that managing a HOSI in a national park aligns with the purposes of national parks, further clarity is needed to eliminate any doubt.
- 89. Currently, the designation and management of a HOSI must be consistent with not just the NPA, but also the policies, strategies and plans guiding conservation management within the national parks. Those policies, strategies and plans must be consistent with the NPA, including the requirement that introduced animals are exterminated as far as possible. All the policies, strategies and plans guiding management of national parks predate the GACA and HOSI provisions and so cannot have been written to reflect the modern approach to game animal management and conservation that the GACA envisions.

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<sup>18</sup> Environmental Defence Society Inc v New Zealand King Salmon Company Ltd [2014] NZSC 38

90. Existing policies, strategies and plans (that HOSI must be consistent with) do not contemplate HOSI. While many of the conservation policies, strategies and plans acknowledge recreational hunting as a preferred means of eradication of game animals<sup>19</sup>, they do not give guidance to conservation managers regarding the interaction between the GACA, HOSI, and the designation of the land as a conservation area, national park, or reserve.

#### Recommendation

91. The GAC recommends further amendments to the GACA to replace the 'consistent with' wording with the less rigid wording: 'must have regard to'.
92. 'Must have regard to' is interpreted as a legal obligation to actively, properly, and genuinely consider a matter, though the final decision may depart from it, provided there are sound reasons for doing so<sup>20 21</sup>.
93. We believe this wording change would achieve the same outcome while creating an appropriate amount of flexibility, given that the GACA framework is much more modern than the conservation framework it is working alongside.

### **The Game Animal Council needs more power to assist the Minister in establishing and managing HOSI**

#### Problem statement

94. The GACA does not currently give the GAC a specific role in advising the Minister on HOSI. That role has currently inappropriately defaulted to the Department of Conservation. Changes are needed to the GACA to make it clear that the GAC has functions in assisting the Minister to establish and manage HOSI.

#### Explanation

95. The GACA give the GAC a general role to provide advice to the Minister, and to manage HOSI when the Minister specifically delegates that function. But the GACA doesn't specify functions for the Council when it comes to:
- a) preparing proposals for HOSI,
  - b) giving the Minister advice on the hunting and conservation benefits of establishing HOSI, or
  - c) developing herd management plans for HOSI.

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<sup>19</sup> For example, the Kaweka Forest Park Conservation Management Plan 1991 (p 38), Nelson Lakes National Park Management Plan 2003 (p 45), Bay of Plenty Conservation Management Strategy 1997-2007 (p 112).

<sup>20</sup> Unison Networks Ltd v Commerce Commission [2007] NZSC 74

<sup>21</sup> CREEDNZ Inc v Governor-General [1981] 1 NZLR 172 (CA)

96. Providing advice to the Minister on these matters has by default fallen to the Department of Conservation. The Department do not have the legislative mandate or expertise to manage game animals for hunting. In contrast, the GAC is a specialist body with strong grassroots connections to the hunting community. It was specifically established by the GACA to assist the Minister in matters of game animal hunting. It is better placed to provide advice to the Minister on HOSI than the Department.
97. Currently, the GAC only has a role in HOSI after it has been established, and if the Minister specifically delegates the GAC functions in relation to each HOSI as it is established. This is a relatively inefficient approach that could be streamlined by changes to the GACA that give those functions to the GAC by default, after the Minister has established the HOSI.
98. Enforcement of herd management plans and hunting authorisations relies on the Director-General of Conservation appointing enforcement officers (Schedule 1 GACA). The HOSI framework was developed with a goal to bring hunters on board with conservation and game animal management. The involvement of the Department of Conservation in compliance and enforcement of hunters may be less effective than this role being managed and undertaken under the control of the GAC.
99. A good example of appropriate game management responsibilities and advice being undertaken by a specialist statutory organisation is Fish and Game. Fish and Game has an active role in the management of sports fish and game birds, as required by the Minister under the Conservation Act 1987. The Minister has oversight but does not need to specifically delegate functions for every management decision. This model is efficient and achieves excellent outcomes for hunters and fishers without a bureaucratic burden on the Minister.
100. By giving the GAC more explicit functions around advising the Minister on establishing and managing HOSI, and default functions after they have been established, we can improve the management and sustainability of our wildlife resources while also supporting hunting interests effectively.

#### Recommendation

101. To enhance and streamline the establishment and management of HOSI, we recommend adding more functions to the GAC for advising the Minister on the establishment of HOSI, providing GAC with the functions of developing the Herd Management Plan, and default functions after a HOSI has been established, rather than requiring a separate process of delegation from the Minister. This aligns with the broader legal framework and ensures that the GAC can effectively perform its duties.

**102. Proposed wording changes**

Deletions are ~~struck through~~; additions are underlined.

Type	Section	Changes	Explanation
<b>Defining where a HOSI can be designated</b>			
Delete	Subpart 3 16(1)	The Minister may, by notice, designate any species of game animal in a specified area <del>on public conservation land</del> to be a herd of special interest if—	Provides for HOSI across land types for consistent and efficient management.
Add	Subpart 3 16(1)(ca)	<u>Where a HOSI designation includes land other than public conservation land, a contractual arrangement with the relevant landowner/manager should be made, specifying such conditions as are mutually agreed upon.</u>	Protects the rights of landowners/managers, including Māori lands
Add	Subpart 3 18(2A)	<u>Where a HOSI designation includes land other than public conservation land, the Minister's powers may only be exercised in accordance with the conditions set out under a contractual arrangement with the relevant landowner/manager.</u>	Protects the rights of landowners/managers, including Māori lands
Delete	Subpart 3	the specified area <del>of public conservation land</del> where the animals are located; and	For consistency within the Act.

	16(3)(b)		
<b>Aligning legislation with original intent</b>			
Add	16 (3C)	<u>Where the Minister designates a herd of special interest in a national park, management of that herd in accordance with the herd management plan made under section 19 is considered consistent with the requirement in section 4(2)(a) of the National Park Act.</u>	Establishes that HOSI management is consistent with the requirement that national parks are “preserved as far as possible in their natural state”.
Delete	16(1)(a)(iii)	<del>Management of the animals for hunting purposes is consistent with the overriding considerations; and</del>	Removes circular policy. The Minister is already required to have regard to overriding considerations under section 16 (1)(b)(iii).
Delete	19(4)	<del>Herd management plans must be consistent with the overriding considerations.</del>	Removes the impact of unnecessary limiting provisions within lower-level statutory planning documents, particularly where the preparation of these documents superseded the

			establishment of the GACA or reviews are overdue.
Add	19(5)(ca)	<u>have regard to overriding considerations.</u>	Ensures that the making or amending of herd management plans requires the Minister to give genuine attention and thought to the intent of the conservation planning framework.
Modify	20(6)(b)	<u>has regard to</u> <del>is consistent with</del> the overriding considerations; and	For consistency within the Act.
Modify	21(b)(i)	<u>having regard to</u> <del>consistently with</del> the overriding considerations; and	For consistency within the Act.
Modify	4(2)(a) National Parks Act		Amend so that it is clear that the requirement for preservation in a natural state is satisfied by appropriate management under a designation made under s16 of the Game Animal Council Act.

Modify	4(2)(a) National Parks Act		Amend so it is clear that the requirement in section 4(2)(b) is subject to, and does not limit, any designation of a Herd of Special Interest made under the Game Animal Council Act 2013.
<b>Functions of the Game Animal Council</b>			
Repeal and replace	7(1)(i)	<p><del>In respect of herds of special interest for which the Minister has delegated management powers under section 20 to the Council,=</del></p> <p><del>(i) to undertake management functions that are compatible with the management of public conservation land and resources generally;</del></p> <p><del>and</del></p> <p><del>(ii) to exercise its powers for the effective management of the herd:</del></p> <p><u>In respect of herds of special interest -</u></p> <ul style="list-style-type: none"> <li>i. <u>to provide advice to the Minister on proposals to establish herds of special interest,</u></li> <li>ii. <u>prepare, review and implement herd management plans,</u></li> </ul>	Provide additional functions to the GAC with respect to HOSI and clarity on those functions.

		<p><b>iii.</b> <u>perform any other functions that the Minister may require to establish and manage HOSI.</u></p>	
Amend	Schedule 1		<p>Amend to provide that enforcement officers can be appointed by the Chief Executive Officer of the Game Animal Council, rather than the Director General of Conservation.</p>

If you have any queries relating to this feedback, please contact me on 027 290 4827 or at [Corina.Jordan@nzgac.org.nz](mailto:Corina.Jordan@nzgac.org.nz).

Yours sincerely,



**Corina Jordan**  
Chief Executive Officer  
New Zealand Game Animal Council

## **Appendix A : Expert evidence from Dr Ken Hughey, Dr Graham Nugent and Gary Ottmann on the Game Animal Council (Herds of Special Interest) Amendment Bill**

24 July 2025

### **Expert Evidence**

Emeritus Professor Dr Ken Hughey

[Ken.Hughey@lincoln.ac.nz](mailto:Ken.Hughey@lincoln.ac.nz)

- 1 My name is Ken Hughey. I am an emeritus professor of Environmental Management at Lincoln University. I am semi-retired and working part time as an environmental consultant, mostly at the moment for Meridian Energy, Amuri Irrigation Company and MBIE.
  - 2 I am on the Governance Group of Tiakina Kauri (the MPI-funded kauri dieback agency) and co-chair of the Orana Park Trust Board. Prior to my retirement from Lincoln University I was (for 3 days per week) Chief Science Advisor at DOC in Wellington for 8 years. During that time, I was heavily involved in providing advice to the Department on Tahr management.
  - 3 In my earlier career at DOC I was responsible also for preparing the Himalayan thar control plan. More recently, I provided further input through the Tahr Plan Implementation Liaison Group process.
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24 July 2025

### **Expert Evidence**

Dr Graham Nugent

[gornugent@gmail.com](mailto:gornugent@gmail.com)

- 4 My name is Graham Nugent. I am an applied wildlife ecologist whose 40-year career has focused on the impacts and management of introduced mammals in New Zealand, particularly deer, pigs, Australian brushtail possums and rats. Initial projects in the 1980s centered on deer management (particularly in the then newly declared Recreational Hunting Areas) but included the effects of helicopter-based commercial hunting in Fiordland and the first ever national survey of hunting in 1988. In the 1990s, I compared deer impacts at different densities in native forest regeneration. Many plant species were affected only at high deer densities whereas highly preferred plants were impacted even at low densities, with little change in impacts over a wide range of intermediate densities. This provides scope for deer managers to simultaneously deliver both conservation and hunting benefits.
- 5 Since 2000, my focus has been on the epidemiology of bovine tuberculosis (TB) in wildlife. I confirmed that wild deer and pigs were spillover hosts not able to independently sustain TB (and so did not require population control).

- 6 I had a central role in developing a “Proof of TB Freedom” framework for declaring areas free of TB that, in 2016, led to the adoption of a goal of national eradication of TB by 2055.
  - 7 Despite the increased focus on TB, I maintained a strong interest in game animal management. This included membership of the Ministerial panel that, in 2008, recommended better accommodation of hunting interests regarding deer, chamois, tahr and wild pigs, leading to the establishment of the Game Animal Council.
  - 8 Since ‘retiring’ in 2021, I have continued my involvement in deer-related management issues in New Zealand. This includes co-authorship of a review rebutting conservationist claims that deer control would massively increase carbon storage in native forests. Most recently, I co- led the development of a draft set of provisions that could be included in a plan for managing Wapiti as a HOSI. That document supports the now-submitted proposal that Fiordland wapiti be declared a Herd of Special Interest.
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24 July 2025

## **Expert Evidence**

Garry Ottmann

[g.ottmann@gameandforest.co.nz](mailto:g.ottmann@gameandforest.co.nz)

- 9 My name is Garry Ottmann. I have over 30 years’ experience in all aspects of hunting and game animal management, biology and policy formulation together with extensive experience in conservation legislation, policy and planning processes.
  - 10 I also have extensive experience as both chair and member of many community groups, committees and forums and consultation processes. I have detailed knowledge of public processes having served on several government committees. I was a member of the Game Animal Panel and Chair of the Game Animal Council Establishment Committee.
  - 11 During my time as a GAC Council Member, I was involved in the initial project to map out the process of establishing HOSIs. I have 32 years’ experience in the game animal space, representing the GAC and other organisations on the TPILG and advising the GAC on tahr matters generally, a role I also still undertake.
  - 12 I was co-author of the draft management program for MU1 and co-led with Graham Nugent, the development of a draft set of provisions that could be included in a plan for managing Wapiti as a HOSI. This document supports the now-submitted proposal that Fiordland wapiti be declared a Herd of Special Interest.
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## **Introduction**

- 13 The purpose of this paper is to outline the broad characteristics of valued introduced game animals in Aotearoa New Zealand, to describe the principles of effective game animal management, to outline why game animal management is failing (including the implications

for biodiversity conservation), to describe how a hunter-led and community-based approach to game management can deliver biodiversity conservation and hunting outcomes, and finally to outline key directions in the Aotearoa New Zealand Biodiversity Strategy that are consistent with achieving biodiversity and game management outcomes. Conclusions then follow.

## **History and general characteristics of game animals in New Zealand**

- 14 Ten species of non-native game animals have at least one viable wild population in New Zealand (7 deer species, tahr, chamois and pigs). Pigs were gifted to Māori as a food source in the late 1700s. The other species were introduced between 1851 (red deer) and 1905 (wapiti) for sport hunting and were managed as game animals until the 1930s. Some of the introductions were prestigious gifts of state (e.g., wapiti were gifted to New Zealand by the USA President).
- 15 Red deer are the most widespread game animal (primarily because they were released at more than 250 locations) and now occupy 158,000 km<sup>2</sup> (~58% of NZ). They are therefore the most frequently hunted deer species and most valued game animal. Pigs are also widespread, especially in the North Island where they are widely used as a wild food resource and are regarded by Māori as taonga. Numerous populations of fallow occupy 28,000 km<sup>2</sup>, while the other deer species now have just one or two populations now occupying 0.7-4.3% of New Zealand. Tahr occupy in excess of 7000km<sup>2</sup> of land between the Rakaia River and the Haast Pass with Chamois being found throughout the Southern Alps from Marlborough to Fiordland and from the foothills in the east to sometimes sea level in the west. The value of the rarer species lies in their rarity, particularly wapiti and tahr which provide the only substantive opportunities globally to hunt these species outside their native range.
- 16 The history of game animals in New Zealand has been hugely influenced by societal attitudes, research and scientific knowledge, advances in technology, and government policies. For instance, deer have been variously a government sponsored asset for tourism, a recreational sport resource, a food source, a noxious pest to be eliminated, the basis of a wild venison export industry, the foundation of a new farmed livestock industry, and a resource for industries based on professional guiding and trophy hunting.
- 17 Over the past 50 years there has been a succession of commissioned reports, plans, proposals, discussion documents and legislative adjustments, none of which has succeeded in accommodating the often-divergent interests of the various sectors representing conservation, sport, recreation, and private and commercial utilisation for food and tourism.
- 18 Legislation and administrative attitudes towards game animals have often lagged well behind public opinion and technology. New Zealand has developed world-leading systems in game animal control and capture, game farming and science, and land management and containment. Increasing affluence and mobility has seen growth in recreational hunting and greater use of the outdoors by urban dwellers. Yet there has been little utilisation of these resources to seek enduring solutions to conflicts surrounding game animals.

- 19 The establishment of the New Zealand Game Animal Council in 2013 revealed the determination of the last two (and previous) governments, and a succession of Ministers of Conservation, to address the conflicts that have plagued the administration of game animals in the past.

### **Principles of game animal management**

- 20 When first occupying a new area, game animals such as deer typically have access to abundant high quality food sources. The animals are therefore healthy and in good physical condition with a high reproductive rate. In the absence of hunting (and any other form of predation), their numbers increase toward the maximum 'carrying capacity' density that the habitat can sustain. However, the amount and quality of food available per capita diminishes to the point where the animals are close to starvation and are unhealthy, diminishing their value as a food and/or trophy resource<sup>22</sup>. Also, their reproductive rate (and therefore the sustainable yield) is close to zero.
- 21 Game management therefore aims to reduce animal densities to moderate levels, resulting in a healthy population producing a sustainable annual yield of high-quality animals. Where the value to hunters derives primarily from food (i.e. meat) yield, the maximum sustained yield will typically be achieved at about half the carrying capacity. Where the value to hunters is primarily related to the opportunity to obtain a high-quality trophy, selective harvesting or removal of female deer or tahr can be used to attain a low-to-moderate density population that is easier to maintain and deliver a sustainable number of adult male trophies annually. In New Zealand, that is epitomised by the management of wapiti by the Wapiti Foundation.
- 22 An important conservation benefit of game management is that it reduces the adverse impacts of the animals on their environment. In New Zealand, a wide array of introduced plants and animals (game animals included) cause unwanted changes in the composition and structure of native ecosystems, but the conservation funding and resources available to mitigate those effects are vastly inadequate and only a few areas of highest conservation value can be affordably managed. In this context, managing game animal populations at reduced densities to improve hunting benefits can at the same time produce also substantial conservation benefits (e.g., the Wapiti Foundation runs a successful predator control programme to enhance whio / blue duck conservation).
- 23 An example is retention of native forest canopy cover. At carrying capacity, deer can reduce regeneration of some of the canopy dominant species, but those species are generally not preferred foods. Halving deer densities to improve sustainable yield and trophy quality will therefore help ensure canopy replacement.

### **Why the current system is not working**

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<sup>22</sup> Pigs are somewhat different as their food sources are more variable, so pig populations are prone to booms and busts.

24 The system is not working because, the GAC Act 2013 aside, all other legislation classes wild game animals essentially as pests to be controlled for their harmful effects only and hunters reduced merely to the tools of that control. Further, the well-meaning but misguided wording of the National Parks (calling for the extermination of introduced species) and Wild Animal Control (control and where necessary eradication) Acts has often led, or as enunciated by DOC officials, compelled the Department and its predecessors to focus on simply reducing game animal numbers rather than prioritising action based on its value and cost-effectiveness in terms of nature (biodiversity) gains or managing for the resource value of game animals. Some of the tools used for management and other purposes are crude at best and deliver at times perverse outcomes, e.g., Wild Animal Recovery Operations focus on the largest animals, often stags, and therefore remove the hunting value without maximising potential conservation gains by concentrating on females (which control population size and thus densities).

### **How to empower communities and hunter led management to deliver improved conservation outcomes**

25 There are as yet, few working examples of hunter-led management of game animals in New Zealand. This largely reflects the fact that the legal status of wild game animals in New Zealand, prior to the formation of the GAC was, effectively, management as pests. However, as noted above, the management of Wapiti in Fiordland by the Wapiti Foundation epitomises what is possible using modern game management principles with a clear focus on protecting nature conservation values while delivering also recreational and other values. Recreational hunters fund the Foundation, which uses commercial harvest and (where necessary) culling to waste to selectively reduce the number of female deer (including red deer, and thus overall deer density). That approach has resulted in increased availability of adult male trophies whilst delivering better indices of forest regeneration than in other parts of Fiordland.

26 To achieve this modern approach which delivers both biodiversity and hunting outcomes requires policy and in places legislative change, as well as attitudinal change. Inclusion of valued introduced species into Te Mana o Te Taiao - Aotearoa New Zealand Biodiversity Strategy 2020 (ANZBS) is an example of such policy change. But legislative change is also needed, to the National Parks and Wild Animal Control Acts in particular – removing the extermination/eradication ethos will encourage hunting interests to engage with National Park and other public conservation land management.

27 It is this encouragement, through the establishment of Herds of Special Interest (HOSI) and via other hunter and community-led initiatives that will help deliver work that DOC and others cannot do. Legislative change is also required to provide certainty and security of tenure for hunters and community led game animal management programs. Current legislation and policy makes such programmes vulnerable to mood swings within policy and planning provisions for public conservation land.

### **Enlightened thinking**

28 Alongside the unique biodiversity, non-indigenous species are also a part of nature found in Aotearoa New Zealand. Many animals and plants have been introduced to the country over the last 800 years. These include livestock and crops, trees that make up the forestry industry, garden plants, animals and fish that are hunted for sport or food, and many more. Many of these species are critical to our everyday lives and to the primary sector, while others provide recreational and commercial opportunities and avenues for conservation efforts – and some are considered mahinga kai by Māori. These species are considered valued introduced species. However, a number of introduced species threaten indigenous species, valued introduced species and ecosystems through predation, browsing, disease, competition and habitat degradation. Reaching a balance to ensure that valued introduced species continue to provide the benefits they are valued for, while also ensuring that indigenous biodiversity thrives, is a key challenge for Aotearoa New Zealand.

The place and permanence of valued introduced species is acknowledged in Te Mana o te Taiao – ANZBS where it sets out that Introduced (or non-indigenous) biodiversity is an ecological reality in Aotearoa New Zealand that is neither ‘all good’ nor ‘all bad’, with the benefits or impacts of introduced species to their surrounding environment often depending on the situation. Te Mana o te Taiao – ANZBS, recognises and prioritises the special responsibility we have towards indigenous species, while still recognising the recreational, economic and cultural benefits and human sustenance of valued introduced species. Protecting and restoring biodiversity can, in some cases, be compatible with its sustainable use. Therefore, while Te Mana o te Taiao – ANZBS is focused on the protection and restoration of biodiversity, its scope also includes aspirations around customary harvest and sustainable use.

### **Te Mana o te Taiao – ANZBS Goals for protecting and restoring**

29 The ANZBS provides the opportunity for enlightened thinking and action to drive management that achieves a range of game animal management and biodiversity conservation outcomes. Key elements are summarised below:

- a. 2025: The impacts of introduced browsers, including valued introduced species (pigs, deer, tahr and chamois), on indigenous biodiversity have been quantified, and plans for their active management have been developed with Treaty partners, whānau, hapū, iwi, Māori organisations and stakeholders;
- b. 2030: Introduced browsers, including valued introduced species, are actively managed to reduce pressures on indigenous biodiversity and maintain cultural and recreational values;
- c. 2050: Introduced browsers, including valued introduced species, have been removed from habitats that are threatened biodiversity areas and ecosystems, and are under ongoing management elsewhere to maintain functioning ecosystems and cultural and recreational values

30 Te Mana o te Taiao – ANZBS was released in 2020 and represents modern thinking around game animals, but what is lacking is the underpinning legislation as legislative reform has lagged behind policy development. HOSI under the GAC Act 2013 is a mechanism by which we can give effect to the goals of Te Mana o te Taiao – ANZBS where indigenous and valued

introduced species can (often) coexist both in National Parks and other conservation land designations.

## **Conclusions**

- 31 Aotearoa New Zealand's native biodiversity is hugely valued, but so too are the valued introduced game animals that are now occupying much of the country's landscape. While it is recognised that the country's biodiversity faces enormous threats, including from these animals, it is increasingly acknowledged that DOC alone cannot manage nature conservation and that modern game animal management with a focus on values can deliver multiple beneficial outcomes.
- 32 The Wapiti Foundation's work in Fiordland National Park is a great example that delivers excellence in hunter value delivery and in biodiversity conservation gains. Other possibilities exist to do similar but only when the appropriate policy, regulatory and legislative arrangements are in place – an immediate example being the need to modernise the National Parks Act to remove the extermination of non-indigenous animals' goal. In addition, core government agencies, particularly DOC, need to be encouraging these initiatives. The ANZBS provides a framework for some of these initiatives, and the HOSI provision in the GAC provides one of many potential mechanisms for delivery. If these approaches are supported, then hunter-led management will likely flourish and deliver multiple outcomes to benefit all.

## Appendix B Four case studies of game animal management

### 1. Sika Herd of Special Interest Application

New Zealand's sika herd is the only wild herd of sika in the Southern Hemisphere and sika hunting is an iconic drawcard that brings domestic and international hunting tourism, and economic benefit to the Central North Island area.

Sika can also cause undesirable impacts on conservation values. These impacts are being realised in many areas of the sika range under the current management framework, resulting poor conservation, hunter and community outcomes.

A community-based grass roots organisation was formed in 2015 – The Central North Island Sika Foundation (CNISF) - to drive increased environmental protection of the Kaimanawa and Kaweka Forest Parks, while ensuring the community benefits of sika are maintained.

The CNISF has been undertaking population control, hunter education and monitoring of the herd and the forest under its Adaptive Deer Management and Research plan (est 2022). Through this work the CNISF has:

- Removed approx. 1100 deer from the 16,000ha Kaimanawa Remote Experience Zone, using a combination of recreational hunters, professional ground hunters and aerial (conventional and thermal assisted) operations, with a baseline SRI/FFPI measurement in conducted 2022/23 and remeasure completed in 2025.
- Completed SRI/FFPI baseline monitoring in a further four out of nine management units (55,500ha) varying in habitat type, hunter access and stress across the proposed Sika HOSI area (126,000ha).
- Technical reports for the REZ + remeasure capturing response to management, and other baseline MU's measured due early August 2025.

The CNISF applied to designate a sika herd of special interest earlier this year. The application outlines the intent of the HOSI to manage this valued introduced species in a way that:

- is compatible with the areas conservation management objectives including ensuring sustainable forest canopy regeneration, and
- enables increased community and iwi stewardship of the area, and
- enhances hunter participation in herd management, and
- increases conservation, recreation, community and economic benefits.

Department of Conservation Ministerial Briefing on the Sika HOSI proposal 21 March 2025:

*“The CNISF proposal is for a HOSI managing sika deer in the Kaimanawa and Kaweka Forest Parks, located east of Tongariro National Park. The proposed management objectives are to reduce animal numbers down to a level that makes for a sustainable, high-quality hunting resource and ensures that the forest in the two parks can regenerate. DOC considers that HOSI management, with appropriate targets and resourcing, would improve both habitat and animal health.”*

Sika HOSI management is designed to support the sustained protection of conservation values in the Forest Parks for all users to enjoy, by recognising and integrating the value of sika and sika management to hunters and the wider community into the management framework.

The sika HOSI provides a leg-up to a community driven initiative that will provide substantial benefits to conservation, recreation and communities connected with the Kaimanawa and Kaweka Forest Parks and over the long term will save the Crown money.

## **2. Wapiti Herd of Special Interest Application**

The Fiordland wapiti herd holds historical significance and is a New Zealand hunting icon, gifted to New Zealand by United States President Theodore Roosevelt in 1905 and representing one of the few truly wild wapiti herds outside their native range.

Wapiti, if poorly managed can also cause undesirable impacts on conservation values. These impacts are currently being limited through good management by community-based grass roots organisation formed in 1993 – The Fiordland Wapiti Foundation (FWF).

The FWF management of Fiordland Wapiti is currently being enabled through a community agreement with the Department of Conservation, with the intent to manage this valued introduced species in a way that:

- is compatible with the areas conservation management objectives including limiting alpine browse impacts,

Through their management, the area of Fiordland National Park that enjoys the sustained efforts and focus of the FWF has lower deer populations, more monitoring and continued protection of conservation values than most of the rest of Fiordland National Park. All of this is delivered at near no cost to the taxpayer.

For the 2024/25 season, in Fiordland National Park (1.2 million ha), a total of 2,542 deer and 56 chamois were shot, all by contractors.

Included in that—The Wapiti Foundation removed 1216 deer and 50 chamois—close to half of the annual total harvest within only 13% of the Park.

This has been achieved by applying a management approach that enhances hunter experiences and contributions to herd management, and increases conservation, recreation, community and economic benefits.

This arrangement has been challenged by an environmental organisation on the basis of the National Park status of the area, putting at risk the benefits that the FWF provides to conservation, recreation, community and the economy through its activities.

The FWF applied to designate a sika herd of special interest earlier this year. The application outlines the intent of the HOSI to manage this valued introduced species in a way that:

- is compatible with the areas conservation management objectives including continued protection of the alpine environment and additional sustainable forest canopy regeneration, and
- enables continued community and iwi stewardship of the area, and
- continued hunter participation and contribution to herd management, and
- continued conservation, recreation, community and economic benefits.

The designation of the Wapiti HOSI would:

- enable hunting-based outcomes to be incorporated into management in a way that is not provided for under the current agreement, and
- increase the level of ecological monitoring
- enhance the protection of conservation values, and
- continue to deliver increasing community and financial benefits, and
- provide long-term security and certainty to the FWF that the benefits it provides can continue independent from government focus and resourcing.

The Game Animal Council (Herds Of Special Interest) Amendment Bill (the Bill) clarification ensures the FWF activities and the benefits it provides to Fiordland, hunters and the community can continue.

### **3. Management of Himalayan Tahr**

The management of Himalayan tahr is directed by a 1993 wild animal control plan under the Wild Animal Control Act 1977. This plan is administered by the Department of Conservation.

While the plan acknowledges that hunters are a tool to support tahr management, the focus of its objectives is conservation protection through tahr population control. This is in accordance with the conservation framework, whereby the values of hunters and the benefits of valued introduced species are not considered within management design.

The tahr control plan was not effectively implemented between 1993 and 2018, resulting in the following:

- Increased tahr populations, and
- Increased tahr impacts on conservation values, and
- Increased economic and community benefits from tahr, and
- Increased popularity of tahr hunting, and
- Unrealised potential learnings to support adaptive management, and
- No review of the plan.

From 2018 onwards, the crown has invested substantial resources in the plans implementation, resulting in the following:

- Extreme social dispute from hunters on the underlying principles of the plan in relation to science-based management of a valued introduced species, and
- Perpetual social dispute from hunters on the recreational, commercial and community consequences of following the plan and whether it is fit-for-purpose today.
- Increased conflict between different forms of hunting activities and the administration of these activities, and
- Increased conflict between hunters and environmentalists, and
- Perpetual social dispute from hunters and environmentalists on whether implementation of the plan can deliver conservation outcomes, and
- Some evidence of a population reduction in some places.

A community-based grass roots organisation was formed in 2015 – the New Zealand Tahr Foundation (NZTF) – with the aim of achieving improved conservation outcomes in a way that maintains social values of tahr and to resolve the inherent conflicts within the tahr management system.

The NZTF have been contributing to tahr population control through a community agreement with the Department of Conservation, trialling an approach to reduce populations within a small area of South Westland in a way that maintains the community and hunter benefits of tahr in this area. The NZTF contributed the equivalent of approximately 22% of DOC tahr control for the year 2024/2025 at little to no cost the taxpayer.

Data taking the average of three years ending 2023/2024 - other hunting sector contributions to annual tahr control at little to no cost the taxpayer are estimated to be:

- Commercial hunting sector - equivalent to between 60-100% DOC tahr control.
- Recreational hunter sector – equivalent to 2-3 times that of DOC tahr control.

These figures highlight the importance of hunting to managing the tahr population and the potential for hunters to provide increased contributions by recognising and integrating their values into the management framework.

To this end the NZTF began negotiating a community agreement with the Department of Conservation for the management of tahr in one of the management units with the intent to increase hunter contributions to tahr management and support increased conservation outcomes in this area. This negotiation process has been ongoing for two years and is yet to be concluded or implemented.

More recently, the NZTF have lodged an intent to prepare a HOSI application for tahr management as the HOSI mechanism is the only option available to address the ongoing value challenges plaguing tahr management, whilst continuing work to reduce tahr populations and their impacts.

#### **4. Recreational Hunting Areas**

Recreational hunting areas can be declared under the Wild Animal Control Act 1977. This provision came about when the commercial meat value of deer was so high that operators reduced populations to levels where there were insufficient deer to ensure recreational hunting could continue.

In these areas, recreational hunting is to be used as a control tool (though not exclusively), and commercial hunting is not permitted. Each recreational hunting is supposed to be managed under a wild animal control plan issued by the Director-General and revised from time to time at intervals no greater than 5 years.

There are nine recreational hunting areas in New Zealand, though the planning documents required under legislation are not current or have been rolled into broader conservation planning documentation. On the ground, there is little to no management or monitoring being undertaken.

Since their establishment, the commercial meat value of deer has decreased to the point that commercial meat harvest is only ~20,000 animals across New Zealand and ineffective deer management under the current framework is resulting in increasing populations in many places.

Quality game animal management requires ongoing focus, investment and proactive effort. This can only be achieved when communities are supported by a government body with a clear and direct focus on quality game animal management, being management that provides great outcomes for conservation, recreation, communities and the economy.

## Appendix C

Economic expert evidence from Dr Geoff Kerr 24 July 2025

### Expert Evidence on the Game Animal Council (Herds of Special Interest) Amendment Bill

Emeritus Professor Geoffrey Kerr

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#### Introduction

- 1 My name is Geoff Kerr. I am an emeritus professor at Lincoln University where I had 42 years' experience teaching environmental management, mostly at the postgraduate level. I have a long history of publishing academic research into New Zealand game animal hunting participation, motivations, behaviours, the economic value of game animal hunting, and how the net benefits of game animal hunting to hunters are affected by changes in hunt attributes.
- 2 My research includes a longitudinal study in which I surveyed a large panel of game animal hunters each month in 2011-2012. I repeated that study, with some refinements, in 2024-2025 on behalf of the Game Animal Council. This work has been extremely valuable in providing deep understanding of hunters' behaviours.
- 3 I was a foundation member of the New Zealand Game Animal Council, serving two terms as deputy chair. I continue to provide consultant support to the Game Animal Council, and I represent the Council on the Tahr Plan Implementation Advisory Group (TPILG). On behalf of the Game Animal Council, I work with the Department of Conservation, Te Runanga o Ngai Tahu, Te Runanga o Arowhenua, and the New Zealand Tahr Foundation to help develop hunter led-management of Himalayan tahr in Management Unit 1, as enabled by the *Himalayan Tahr Control Plan*. As part of my work to support the TPILG and the GAC I have developed statistical models of game animal populations that identify the opportunities for improving hunting outcomes by managing harvests.
- 4 I am currently assisting the New Zealand Tahr Foundation to consider the potential implications of managing tahr as a Herd Of Special Interest (HOSI).
- 5 **The Game Animal Council Amendment Bill** provides opportunities for management of game animals in national parks that would be beneficial both for the environment and for game animal hunters. In its current form, this bill would not, by itself, mean that game animals within national parks would be managed as HOSI – there are numerous hurdles any such proposal would need to overcome, identified in the Game Animal Council Act (2013), including favourable assessment of environmental impacts. HOSI management of game animals within

national parks would provide opportunities to improve environmental outcomes over the status quo. It would be foolish not to provide for exploitation of such opportunities where they arise.

- 6 To assist the Committee in its deliberations, this evidence summarises key points from my research on:
  - The economic significance of hunting
  - The magnitude of hunter and Department of Conservation annual game animal harvests
  - Potential economic benefits of HOSI for hunters
  - Potential environmental benefits from HOSI.
- 7 Due to the urgent timeframe for the consideration of this Bill, the evidence below is a high-level summary. More detailed analysis is available if it would be of assistance to the Committee.

### **Executive summary**

- 8 Hunting is a significant economic activity that generates benefits for hunters and the wider economy. HOSI have the potential to provide those significantly increased hunter benefits through changes in hunting management.
- 9 Game animal kills by the hunting sector are of significantly larger scale than official control, consequently small changes in hunter activity can make substantial contributions to conservation. HOSI have potential to result in net conservation gains relative to the status quo and other management alternatives.
- 10 Hunters and the environment can both benefit from appropriately managed HOSI.
- 11 Benefits from HOSI game animal management are independent of National Park status, and adverse environmental outcomes are precluded by over-riding considerations. The ability to have a HOSI in national parks that would be enabled by this Bill does not mean there will be, or should be, a HOSI in any national park. The benefits of HOSI in any national park game animal management context should be evaluated on a case-by-case basis.
- 12 It would be foolish to remove HOSI from the toolbox of potential game animal management options for National Parks.

### **Economic Significance of Hunting**

- 13 Hunting provides two broad types of economic benefits
  - benefits to the general economy, and
  - benefits to hunters.
- 14 Typically, benefits to the economy are measured by hunt-related expenditures, whereas benefits to hunters are measured as consumers' surplus.

#### *Benefits to the general economy*

- 15 New Zealander game animal hunters spend about \$300 million per annum on game animal hunting-related expenditures, excluding vehicles, to support their hunting on land of all tenures (about \$8,000/hunter). This is significantly more than freshwater anglers spend (about \$120 million spent by 100,000 anglers - about \$1,200/angler: NZIER, 2024).
- 16 Applying the NZIER multiplier to hunting expenditures indicates that recreational hunting supports about 2,500 jobs in New Zealand.
- 17 The guided hunting sector is significant. Industry estimates from 2020 were that this sector directly employed more than 530 people, with over \$100m in annual foreign sales and about 6,000 annual trophy exports (NZPHGA et al., 2020).

#### Benefits to hunters

- 18 I have published two studies (Kerr & Abell, 2016; Kerr, 2019) that estimated hunters' consumers' surplus benefits from hunting. Consumers' surplus is the benefit that hunters receive, over and above what the hunt costs them<sup>23</sup>.
- 19 Tahr hunting entails significant costs, identified by the recently completed GAC Hunter Survey. Hunt-specific costs (transport, accommodation etc.) are about \$663/person/hunt, compared with \$301/person/hunt for a typical New Zealand game animal hunt. Wapiti are an outlier, with particularly high mean expenditure per hunt – about \$1,769/hunter.
- 20 For a typical three-day tahr hunt, mean consumers' surplus is about \$1,169 per hunter (Kerr, 2019), inflation-adjusted to 2025 values. That means a typical tahr hunter would be willing to pay about \$1,800 to hunt tahr, but since they only pay about \$660 there is a substantial net benefit to the tahr hunter (\$1,169) from each tahr hunt.
- 21 For sika deer a three-day hunt yields \$1,352 of consumers' surplus per hunter<sup>24</sup> (Kerr & Abell, 2016).
- 22 These two estimates are near the top of the range for peer-reviewed published estimates of consumers' surplus benefits from hunting globally (Gren & Kerr, 2023).

### **New Zealand Game Animal Management**

- 23 By and large (Fiordland Wapiti being a notable exception), game animals on New Zealand Public Conservation Land (PCL) are unmanaged – they are nearly everywhere an open-access resource without limitations on either quality or quantity of game animals harvested. Abundance and herd demographic structure are artifacts of choices made by many individuals operating in the recreational and commercial spheres, with limited official population control in some places when game populations are judged to be excessive or to pose significant environmental harm.

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<sup>23</sup> For example, suppose a hunter would be willing to pay \$1,000 to go on a specific hunt costing them \$400, then that hunter's consumer surplus from that hunt would be \$600.

<sup>24</sup> Quarter 1, 2025 NZ\$

- 24 One might speculate that open-access hunting would invoke the “Tragedy of the Commons”, resulting in heavy depletion of game animal herds. However, that has not been the case recently, when commercial hunting has been largely unprofitable, and increments in game animal abundance have been larger than recreational harvests in many places. In many PCL places, the scales have tipped in favour of deer – hunters are satiated before harvesting sufficient female deer to halt deer population growth.
- 25 Environmental concern and, in some cases, adverse impacts on landholders adjoining PCL have given rise to calls for more concerted effort to control game animals on PCL. There are several ways the hunting sector can contribute to better game animal management, including reductions in game animal abundance:
- i. Increase the number of hunters
  - ii. Improve hunters’ ability to harvest animals
  - iii. Change how many animals and which animals hunters choose to kill
  - iv. Undertake organised management hunts
- 26 One important adverse effect of open-access hunting is that the animals that hunters often target [iii] are not those animals that are most beneficial to remove for conservation (females), or those animals that are most beneficial to remove to ensure the quality of future trophy harvests (i.e., hunters should kill males only after they have reached maturity).
- 27 Reduced game animal populations result in healthier animals (via a healthier environment), which is beneficial to meat hunters as well as to trophy hunters, provided the population is not depleted to a level where harvesting meat animals becomes too difficult.
- 28 Well-managed HOSIs have the potential to redress both the game animal quality (trophy and/or meat) and environmental problems, offering a win-win opportunity where improved hunting is coupled with environmental gains. HOSIs provide an opportunity to change hunter behaviour, including through hunter-led management hunts, for the good of all.
- 29 PCL game animal population control comes from three broad groups: recreational hunters, commercial hunters, and government (whether national or regional). Each of these groups has different motivations and harvest strategies.
- 30 Government control is expensive, kills relatively few animals<sup>25</sup>, and displaces other hunting. The Department of Conservation controls deer across about 2% of the DOC Estate, despite deer being common and problematic across the country. Rightly, DOC focuses its efforts on the most important areas – places where native taonga need protection, and prevention of range expansion into deer-free areas<sup>26</sup>. On the other hand, recreational hunters kill about 180,000 deer a year<sup>27</sup>, dwarfing DOC control.
- 31 The *Himalayan Tahr Control Plan* requires the Department of Conservation to make a considerable investment in tahr control. Like deer, the Department’s effectiveness is limited

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<sup>25</sup> Apart from tahr, estimates of Department of Conservation game animal kills are unavailable.

<sup>26</sup> DOC (2024)

<sup>27</sup> Game Animal Council survey 2024-2025

by resourcing and the recreational and guided hunting sectors make the bulk of annual tahr kills. For the three annual control plan periods between 2021 and 2024 DOC controlled an average of 4,900 tahr per year (Reddiex, 2024). In comparison, guided aerial trophy hunting offsets resulted in control of over 3,000 tahr in 2023-2024 (Reddiex, 2024), and there are about 13,000 annual recreational tahr kills<sup>28</sup> (GAC survey 2024-2025). So, while DOC makes a substantial contribution, it is again outweighed by the hunting sector.

- 32 Small changes in much larger hunting sector game animal harvests (the number of animals killed) and hunting sector harvest demographics (which animals are killed) have the potential to offer much more effective control than expansion of government control, and at no or least cost to the New Zealand taxpayer.
- 33 Government control and hunting-sector management can complement each other. Hunting sector concentration on places where hunters can be most effective frees government control resources for places where the hunting sector is less effective or ineffective – usually because of distance, terrain or weather conditions. HOSI present an opportunity to improve that complementarity.

### **Recreational hunter benefits of improved management**

- 34 My research shows that changes in tahr hunt attributes can have significant positive effects for hunters, signalled by changes in consumers' surplus (Kerr, 2019).
- 35 The value of changed conditions varies for different types of hunters but is most important for avid hunters who often travel a considerable distance to hunt – about 45% of tahr hunters. For these hunters, consumers' surplus was about \$1,080 per hunt. However, their consumers' surplus would be negative if there was low potential to bag a trophy tahr. In other words, these hunters would not hunt tahr if trophy potential was low. For these same hunters, a change from moderate to high trophy potential would increase their consumers' surplus by nearly \$800 per hunt. Not only would these hunters be happier with improved trophy potential – but it is likely that they would hunt more given positive hunting experiences and outcomes.
- 36 Another important driver of hunt value for these hunters was presence of other hunters, which reduced consumers' surplus by about \$500 per hunt, suggesting potential benefits from exclusive blocks. Local hunters were even more sensitive to the presence of other hunters than these avid hunters were.
- 37 The 33% of hunters who travelled moderate distances to hunt tahr had the highest consumers' surplus per hunt (≈\$1,800). These hunters were also adversely affected by lack of trophy potential and presence of other hunters, but less so than for the avid hunters who travelled long distances. Still, the difference in consumers' surplus between low and high trophy potential was highly significant at about \$900 per hunt.

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<sup>28</sup> Outlying large reported recreational hunter kills have been excluded (kills > 3<sup>rd</sup> quartile + 1.5\*inter-quartile distance).

- 38 Similar results occurred for sika deer hunters, for whom consumers' surplus changed markedly in response to the presence of other hunters, sika deer density, and trophy sika stag potential of the hunting location.
- 39 These results indicate significant increases in benefits to hunters from alternative tahr and sika deer hunting management regimes. HOSI's would provide the opportunity to generate those benefits.