

SOUTHLAND CONSERVATION BOARD

TE ROOPU ATAWHAI O MURIHIKU

24 July 2025

Southland Conservation Board Submission re Game Animal Council (Herds of Special Interest) Amendment Bill.

Background

Conservation Boards are independent advisory bodies, established by statute. The Southland Conservation Board represents the community and offers interaction between communities and the Department of Conservation, within the area of jurisdiction of the Board.

The Board has several statutory roles under various Acts including:

- The recommendation of Conservation Management Strategies (CMS) to the New Zealand Conservation Authority (NZCA) for approval
- Reporting on the implementation of the CMS
- The approval of Conservation Management Plans
- The recommendation of National Park Management Plans to the NZCA for approval
- Advising the Department of Conservation and NZCA on conservation matters, and proposed changes to the status of nationally and internationally significant land.
- Liaising with Fish and Game Councils on conservation matters
- Carrying out other powers delegated by the Minister of Conservation, the Conservation Act or any other Act.

Board functions are outlined in section 6(M) of the Conservation Act 1987 and the powers, which enable the Board to carry out those functions, are under 6(N) of the Act. Boards also have a number of functions under section 30 of the National Parks Act 1980.

Southland Conservation Board Region

Approximately 24.23% of New Zealand's public conservation land and area lies within the Southland Conservation Board's jurisdiction.

Public conservation land and areas make up 49.85% of all land in the Southland Conservation Boards rohe. This consists of:

- 1,882,868.11 hectares of Public Conservation Land
- 658,556.90 hectares of Sanctuaries to Protect Marine Mammals
- 951,919.43 hectares of Marine Reserves

Southland Conservation Board Region Features

- Fiordland National Park – 1,278,986.65 ha
- Mount Aspiring National Park – 3.94 ha
- Rakiura National Park – 140,357.89 ha
- Eyre Mountains/Taka Ra Haka Conservation Park – 65,583.88 ha
- Catlins Conservation Park – 2.92 h

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- 72 Scenic Reserves – 26,951.80 ha
- 16 Recreation Reserves – 317.67 ha
- 3 Historic Reserves – 465.83 ha
- 15 Marine Reserves – 951,919.43 ha
- 3 Marine Mammal Sanctuaries – 658,556.90 ha
- 5 National Nature Reserves
- 1 Ecological Area – Lindsay Ecological Area – 126.93 ha
- 350 Stewardship Areas – 235,829.25 ha
- 2 Wilderness areas -Pembroke and Glaisnock Wilderness Area – 141,712 ha
- 2 World Heritage Areas – Subantarctic Islands and Fiordland part of Te Wāhipounamu
- 1 Ramsar site - Awarua Wetland
- 1 Dark Sky Sanctuary
- 700 Archaeological Historic Sites

Southland Conservation Board Guiding Principles:

1. **Principle of Preservation and Protection:** Decisions of the Southland Conservation Board shall be based on the principle of the preservation and protection of the conservation estate and all its natural and historic resources. Activities on the conservation estate, and any effects on its whenua and indigenous flora and fauna, shall be considered in the context of this principle.
2. **Principle of Advocacy.** The Southland Conservation Board shall use its voice to advocate for the mauri / integrity and wellbeing of the natural environment of Aotearoa New Zealand including, but not limited to, her land, waters, ecosystems and biodiversity.
3. **Principle of Treaty Partnership.** The Southland Conservation Board strives to honour its Treaty partnership with Ngai Tahu. In so doing, the Southland Conservation Board shall have particular regard to the voice of Ngai Tahu papatipu runaka ki Murihiku in the decision-making process.

Southland Conservation Board and Game Animal Council (Herds of Special Interest) Amendment Bill.

The Southland Conservation Board has a strong interest in the proposal to designate the Wapiti herd in Fiordland National Park as a Herd of Special Interest (HOSI) under the Game Animal Council Act.

We are very concerned about legislation that is in contradiction with long-standing legislative and statutory provisions designed to protect New Zealand's highly-valued conservation estate, including our National Parks. This includes being in contradiction with the National Parks Act 1980 and without advice from the NZ Conservation Authority.

We note that a Wapiti HOSI would be located in the Te Wahipounamu UNESCO World Heritage Area. A HOSI designation for an introduced pest species in an area internationally recognised for its exceptional natural values is inherently contradictory.

We have long-held grave concerns about the impact of introduced species, most particularly browsing ungulates, on the health of the forest, alpine plant species, and other native biodiversity. This inevitably also impacts the native fauna of Aotearoa New Zealand, including impact on their habitat and food sources.

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We note the recent NIWA-led research indicating that the large areas of native forest in the south-west of New Zealand, and Fiordland in particular, are absorbing more carbon dioxide (CO₂) than previously thought. This holds implications for New Zealand's greenhouse gas reporting, carbon credit costs, and climate and land-use policies. This underpins the importance of prioritising the ecological health of Te Wahipounamu.

We value the work done by the Fiordland Wapiti Foundation and recognise that this is the best currently available form of population control of the Wapiti herd. We support the continuation of the Fiordland Wapiti Foundation's work and would prefer that this could continue without the addition of a HOSI designation.

We note that it is currently beyond DOC's capacity and capability to undertake adequate ungulate control in Fiordland National Park (and elsewhere).

We emphasise the critical importance on ensuring that any special designation like HOSI does not override or diminish iwi rights, responsibilities, or values.

We wish to make the following additional points in reference to our Guiding Principles.

Principle of Preservation and Protection.

We believe that conservation outcomes must come first. This means that any HOSI designation must prioritize ecological outcomes, not recreational hunting.

We support adaptive management based on ecological indicators and call for independent monitoring to avoid conflicts of interest and ensure credibility.

Monitoring must focus on vegetation recovery, seedling recruitment, and deer impact, not just numbers culled. Any targets set must be meaningful and scientifically robust.

We are concerned about the perpetuity of the HOSI designation and ask for mechanisms to review or revoke HOSI status if ecological goals are not met.

We are deeply concerned whether a HOSI designation might affect pest control methods (eg 1080 use) in significant areas. We reiterate that ecological wellbeing and the protection of indigenous biodiversity must be prioritised over recreational hunting.

We are concerned whether DOC's role would be limited to administrative oversight while funding and operational control shifted to external entities. Accordingly we would want to see conservation values and reporting on conservation projects included as part of any Fiordland Wapiti management plan

Principle of Treaty Partnership.

The entirety of the Southland Conservation Board rohe is in the Ngai Tahu takiwa. For the Southland Conservation Board, our relationship with manawhenua is fundamental. The relationship between the papatipu runaka and their whenua and moana is unique and inviolable.

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We emphasise the importance of Ngai Tahu's role in governance and decision making. We support Ngai Tahu's view that any special designation like HOSI does not override or diminish iwi rights, responsibilities, or values.

Summary

The Southland Conservation Board urges the Select Committee to prioritise Treaty principles, ecological integrity, and public accountability throughout the HOSI process.

We support the ongoing work of the Fiordland Wapiti Foundation and other hunting which contributes to herd management, reduction of introduced ungulate species and broader biodiversity management.

We, the Southland Conservation Board, urge that appropriate funding is allocated to the DOC budget to better enable them to undertake the necessary management of the ungulate pest species.

It is our expectation that proper and full compliance from the crown and their agents, with regard to section 4 of the Conservation Act will see full and active protection of taonga species, i.e. all indigenous flora and fauna. It would be highly offensive if we were to see the opposite, that being the full and active protection effectively being bestowed via the HOSI designation onto what we all know and recognise as being a pest species.

We strongly recommend that a precautionary approach is adopted, the proposed amendment is rejected, and an alternative science-based approach is developed, more soundly embedded in the conservation framework.

Yours sincerely



Shona Sangster

Board Chair