[redacted]

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Ref: OIAD-6196

17 April 2026

Tēnā koe [redacted]

Thank you for your request to the Department of Conservation, received on 19 March 2026, in which you asked a series of questions regarding DOC protocols for fur seal pup monitoring.

DOC's fur seal pup monitoring programme provides insights into the health and size of the fur seal population. Scientists use a mark–resight method, which involves trimming a small patch of fur from the heads of fur seal pups. Widely recognised as an effective method for assessing fur seal populations, this work programme has allowed us to identify the impact of the starvation event in 2023/2024 and first detect the unusual mortality caused by a new strain of canine distemper virus.

We have considered your request under the Official Information Act 1982.

We are aware that you have sent similar requests to a number of DOC staff. Please consider this letter to respond to all those requests.

Your questions and our responses are listed below:

1. *Why are fur seal pup heads being shaved exposing scalps, vs part of the torso (or alternatively tagging/colour marking)?*

I can confirm that fur seal pup heads are not being shaved and their scalps are not exposed. Fur seal pups have two layers of fur. This method involves trimming away the dark top layer of fur using scissors (no razors/shaving devices are used), and what you can see in the image you provided is the white, insulating underfur, not the scalp. The layer of removed fur is not waterproof at this age and is moulted off in March/April to be replaced by their adult fur.

2. *And if heads need to be shaved, why to this extent re being identifiable in a population count?*

The head needs to have hair cut to an extent where the pup can be reliably resighted as 'marked' or 'unmarked' regardless of the position/angle of its head when the visual resighting assessments are made. If this designation cannot be made confidently, the results become unreliable. Head markings remain visible from different angles, unlike marks on the body, which are often obscured when pups lie on rocks or play in pools.

3. *How long must pups persist in this state, until fur regrows?*

Fur regrows within weeks and the ‘haircuts’ do not affect feeding or growth. Kaikōura mark-resight assessments occur in February, when pups are still entirely reliant on their mothers for food through her milk and mother-pup bonds are firmly established. They are not yet going to sea to forage for themselves and will not do for several months.

4. *In pups that are already suffering from decreased ocean productivity (climate change and overfishing impacts) regarding starvation, immune ‘compromisation’, and canine distemper - this marking practice is questionable regarding animal ethics?*

Mark-resighting is currently regarded internationally as the best tool for assessing pup production trends and has been used for decades without evidence of adverse effects.
Field work this year was approved by the University of Canterbury Animal Ethics Committee and has been approved by Massey University Animal Ethics Committee in past years.

At the time of marking, pups are mainly restricted to land and shallow pools in/around the colony. The removal of fur does not impact their ability to take part in all the normal behaviours that kekeno pups engage in at this age. The team revisits the colonies in the days after marking and have observed that marked and unmarked pups are engaged in the same behaviours.

As already noted, this monitoring has allowed us to identify the impact of the starvation event in 2023/2024 and is also how we were able to first detect the unusual mortality, which was subsequently discovered to be caused by a new strain of canine distemper virus.

5. *Given that population monitoring is being undertaken because Kaikōura fur seals/kekeno have fared extremely poorly in recent years, is this highly invasive (handling stress) and detrimental approach (impaired function) not counterproductive to aiding seal survival? I have heard of those assisting with counts being proud of having to ‘wrestle’ seals and bruises incurred — is this not akin to wildlife harassment?*

All monitoring work is approved by an Animal Ethics Committee and undertaken in accordance with DOC’s sea lion and fur seal pup tagging and sampling SOP (Standard Operating Procedures) and workplace health and safety requirements.

Capture and handling of any kind is stressful for any wild animal and safe, firm restraint is required to minimise stress for the animals and to ensure the safety of the research team. Pups are held for the minimum necessary time, and their welfare is under constant observation by the team.

6. *Surely there are other methods that can be employed to determine abundance and population trends at breeding colonies?*

As noted, mark-resighting is currently regarded internationally as the best tool for assessing population trends. Previous methods, such as flipper tags and colour dyes, are not currently used to due infection risks, longer restraint times, concerns around leaching and reliability of results.

7. *I request that the DOC Marine Mammal Unit provides supporting evidence, outlining the need for this type of monitoring approach in relation to best practice standards? In short, why was this method proposed over others and who authorised it?*

The methods we employ are regarded as the most reliable way to assess pup production. Unlike direct counts, where the aim is to try and count every single pup in the colony, mark-resighting relies on being able to assess a ratio of marked/unmarked pups. In addition to the greater reliability of the results, this is far more practical in colonies where there are large numbers of pups, or where the terrain means counters would miss substantial numbers of pups. This technique has been used for multiple fur seal species internationally for decades, with no evidence that it has contributed to lower survival in pups assessed and marked.

As mentioned earlier, the University of Canterbury Animal Ethics Committee approved the work undertaken this year.

Thank you for your interest in our monitoring programme. If you would like to read more about DOC's fur seal research programme I have included links to two recent scientific publications that have arisen from our research.

A large mortality event in New Zealand fur seals (Arctocephalus forsteri) caused by a divergent canine distemper virus - ScienceDirect (https://www.sciencedirect.com/science/article/pii/S037811352600132X?via%3Dihub)

Declining Abundance and Variable Condition of Fur Seal (Arctocephalus forsteri) Pups on the West Coast of New Zealand's South Island | MDPI (https://www.mdpi.com/2076-2615/16/1/121)

You are entitled to seek an investigation and review of my decision by writing to an Ombudsman as provided by section 28(3) of the Official Information Act.

Please note that this letter (with your personal details removed) may be published on the Department's website.

Nāku noa, nā

Kirstie Knowles
Director Marine and Freshwater Biodiversity
Department of Conservation
Te Papa Atawhai