

Te Tira Whakamātaki Submission

Action for Nature - Implementing New Zealand's Biodiversity Strategy 2025-2030



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1. Executive Summary

TTW welcomes the opportunity to provide feedback on the proposed implementation plan for Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy 2020 (ANZBS). While we support the strategic shift toward focused critical actions, we have fundamental concerns that the proposed framework perpetuates the same systemic failures identified in "He Mātai i te Taiao: A sense of the environment" (September 2024), which found that *"the current conservation system has not worked for Māori, despite the Treaty-compliant declarations in conservation and environmental legislation, policies, plans and strategies."*

1.1 Critical Findings: The proposed actions fail to address the core systemic issues that have prevented meaningful biodiversity outcomes, particularly the lack of genuine Treaty partnership, inadequate recognition of rangatiratanga and kaitiakitanga, and the continued marginalisation of mātauranga Māori in decision-making processes.

1.2 Key Recommendations:

- **Fundamental System Transformation:** Move from DOC-controlled consultation to genuine co-governance with shared decision-making authority.
- **Legislative Reform:** Enable rangatiratanga and kaitiakitanga through legal mechanisms that allow iwi/hapū to self-authorise conservation action.
- **Direct Resourcing Model:** Establish long-term funding directly to iwi/hapū, removing Crown agencies as intermediaries.
- **Mātauranga Māori Equality:** Position mātauranga as having equal mana to other knowledge systems in all conservation decisions.
- **Accountability Mechanisms:** Create independent monitoring of Crown compliance with Treaty obligations.

2. Fundamental Concerns with the Framework

Q. What do you think of the four themes we are proposing to focus on and use as a way of framing the actions?

2.1 Systemic Failure to Address Treaty Partnership

The proposed four themes framework fundamentally fails to address the systemic issues that have prevented meaningful conservation outcomes for tangata whenua. As documented in "He Mātai i te Taiao," kaitiaki across Aotearoa report that:

"A partnership is about being good friends – not one partner holding power over the other. And there are good people in DOC, but it's the machinery or DOC system itself that is not working and blocking progress." (S Waitai, pers. Comm., Rotorua, July 2022)

2.2 Critical System Failures:

- The Options Development Group (2021) found that *"the principles of Te Tiriti, as they have been defined by the Courts and by the Waitangi Tribunal, are not adequately reflected in DOC's guiding policies."*
- Kaitiaki report processing delays of 12+ months for Wildlife Authority applications.
- Multiple disjointed strategies requiring Māori to engage across different scales and agencies.
- Lack of transparency in decision-making processes.

2.3 The Framework Perpetuates Colonial Control

Rather than addressing these systemic failures, the proposed themes maintain a system where Crown agencies control decision-making while seeking input from tangata whenua as "stakeholders" rather than recognising them as Treaty partners with inherent authority.

2.3.1 What's Missing:

- No mechanism for shared decision-making authority at any level.
- No recognition of rangatiratanga in conservation management.
- No pathway for iwi/hapū to self-authorise conservation action.
- No direct resourcing model that bypasses Crown agency intermediaries.

2.3.2 Fundamental Recommendation: The entire framework must be redesigned through genuine co-leadership with tangata whenua, establishing co-governance mechanisms that enable rangatiratanga and kaitiakitanga as foundational principles, not add-ons.

3. Theme 1: Agreed Biodiversity Priorities

3.1 Action 1: National Picture of Biodiversity Values

3.1.1 Fundamental Concerns: While this action appears reasonable, it exemplifies the systemic problem where Crown agencies continue to control knowledge systems and decision-making about taonga that belong to tangata whenua.

3.1.2 Critical Issues:

- No mechanism for iwi/hapū to control how their traditional knowledge areas are represented.
- Fails to recognise that mana whenua already have comprehensive knowledge of biodiversity values in their rohe.
- Continues the pattern of Crown agencies gathering information about Māori taonga without genuine partnership.
- Risk of Crown appropriation of mātauranga for Crown-controlled conservation planning.

We acknowledge the importance of strategic investment and support the use of existing data and the recognition of Māori and private land. However, to be effective and just, the framework must embed robust protections for Māori data sovereignty and intellectual property, and include clear mechanisms for hapū and iwi to control how their knowledge and biodiversity values are represented. Regional and marine biodiversity assessments, especially for deep-sea and offshore ecosystems, should complement national datasets, provided they are led or governed by mana whenua.

3.1.3 Alternative Approach Required: Rather than DOC developing "a national picture," this action should enable iwi/hapū to lead comprehensive biodiversity assessments in their rohe, with Crown agencies providing technical and financial support when requested. As documented in "He Mātai i te Taiao," successful initiatives occur when *“kaitiaki urged a step-change in the current conservation and environmental systems and processes were needed to realign the sphere of power to iwi and hapū”* (2024, p.x).

3.1.4 Recommendation: Redesign this action to enable iwi/hapū-led biodiversity assessments with Crown technical support, ensuring mana whenua control all aspects of knowledge gathering and application in their rohe.

3.2 Action 2: Priority Programmes

3.2.1 Strong support for:

- Cross-agency coordination on habitat restoration.
- Focus on nature-based solutions for climate change.
- Recognition of threat-led approaches for containment.

3.2.2 Recommended additions:

- Include specific focus on coastal and marine ecosystem restoration.
- Add urban biodiversity restoration as a priority programme category.
- Strengthen connections between pest management and ecosystem restoration.
- Include freshwater-marine connectivity as a priority focus area.

3.2.3 Specific suggestions:

- Develop integrated catchment-to-coast programmes that address land-sea connectivity.
- Prioritise restoration of coastal wetlands and blue carbon ecosystems.
- Include invasive marine species management alongside terrestrial programmes.

4. Theme 2: External Funding and Revenue

4.1 Action 3: Biodiversity Investment Prospectus

4.1.1 Critical Concerns About Philanthropy Dependence:

While this action appears to offer additional resources, it represents a concerning shift toward privatising conservation funding and creating dependency on philanthropic whims rather than systematic public investment. This approach has been problematic in other conservation initiatives and risks undermining democratic accountability in biodiversity management.

4.1.2 Fundamental Problems:

- **Democratic Accountability Issues:** Philanthropic funding often comes with conditions that may not align with public interest or Treaty obligations. Private funders may prioritise charismatic species or high-profile projects over systematic biodiversity protection needs identified by communities and kaitiaki e.g., kiwi vs kauri.

- **Sustainability and Reliability:** Philanthropic funding is inherently unstable and subject to economic cycles, donor preferences, and changing priorities. Conservation requires long-term, predictable funding that only systematic public investment can provide.
- **Potential for Capture:** Private funding can create undue influence over conservation priorities, potentially undermining both public decision-making and iwi/hapū self-determination. As documented in "He Mātai i te Taiao," kaitiaki require authority over priorities in their rohe, not external direction from funders.
- **Inadequate Scale: Philanthropic funding,** while helpful for specific projects, cannot replace the systematic investment required for landscape-scale biodiversity protection. The scale of New Zealand's biodiversity crisis requires government-level resourcing.

4.1.3 Better Approach:

- **Public Investment Leadership:** Rather than seeking private replacement for public responsibility, this action should focus on demonstrating government leadership through adequate public funding, which would then attract additional private sector support.
- **Iwi/Hapū-Controlled Opportunities:** Where external funding is appropriate, it should flow directly to iwi/hapū authorities rather than through Crown-controlled investment prospectuses, ensuring rangatiratanga over conservation priorities.
- **Corporate Responsibility Focus:** Target businesses that profit from New Zealand's natural environment (tourism, extraction industries, agriculture) for contributions that address the environmental impacts of their operations.

4.1.4 Recommendation: Replace this action with "Ensuring Adequate Public Investment in Biodiversity" that establishes systematic, long-term government funding commitments while creating opportunities for iwi/hapū to directly access additional funding when they choose to do so.

4.4.5 Principle: Conservation is a public good requiring public investment, not a charity case dependent on private generosity. Government must lead with adequate funding rather than expecting philanthropy to fill gaps created by public under-investment.

4.2 Action 4: Revenue from Conservation Lands and Waters

4.2.1 Fundamental Concerns About Privatising Public Conservation:

This action represents a troubling shift toward treating conservation as a market commodity rather than a public good that taxpayers already fund. New Zealanders already contribute to conservation through their taxes and creating additional "pay-to-

play" systems effectively creates a two-tiered access model that contradicts democratic principles of public ownership.

4.2.2 Critical Issues:

- **Double Taxation Problem:** New Zealand taxpayers already fund conservation through Vote Conservation. Creating user-pays systems for accessing public conservation lands amounts to **double taxation** - citizens pay through taxes then pay again to access what they already own.
- **Equity and Access Concerns:** Pay-to-play models create barriers for low-income New Zealanders, potentially excluding them from their own conservation estate. This contradicts the principle that **public lands belong to all citizens** regardless of economic status.
- **Treaty Implications:** Any revenue generation must not create barriers to Māori customary access and practices. As documented in "He Mātai i te Taiao," existing regulations already restrict kaitiaki from exercising their responsibilities - adding financial barriers would further **violate Treaty obligations and settlement agreements**.
- **Tourism Industry Focus Missing:** If revenue generation is necessary, it should be targeted at commercial operators and international tourists who profit from or exclusively benefit from New Zealand's conservation estate, not domestic citizens who already fund it through taxation.

4.2.3 Better Alternatives:

Targeted Commercial Revenue:

- **International Tourist Levy:** Specific charges for non-resident visitors to conservation areas – though this must not look like an add on to the existing Visitor Levy.
- **Commercial Operator Fees:** Higher fees for businesses that profit from conservation lands (tour operators, filming, commercial recreation).
- **Corporate Access Fees:** Fees for businesses using conservation lands for corporate events or activities.

Resource User Charges:

- **Extractive Industry Levies:** Higher fees for any remaining extractive activities on or near conservation lands e.g., Wapiti meat extraction.
- **Infrastructure Impact Fees:** Charges for utilities or infrastructure that cross conservation lands.

Partnership Revenue Models:

- **Corporate Sponsorship:** Partnerships with businesses for specific conservation projects without creating access barriers for citizens.
- **Carbon Credit Revenue:** Developing conservation estate carbon credits for corporate offset purchases.

4.2.4 Recommendation: Reframe this action to focus on commercial users and international visitors while explicitly protecting free access for New Zealand citizens and ensuring no barriers to Treaty partner customary practices. The principle should be "those who profit should pay" rather than "citizens pay twice."

4.2.5 Constitutional Principle: Public conservation lands are held in trust for all New Zealanders. Creating financial barriers to access violates this fundamental democratic principle and should be rejected in favour of targeted revenue from those who commercially benefit from these public assets.

4.3 Action 5: Private Sector Nature-Based Financial Disclosures

4.3.1 Strongly support:

- Essential for driving private sector accountability.
- Will help mainstream biodiversity considerations in business decisions.
- Aligns with international trends in sustainability reporting.

4.3.2 Enhancement suggestions:

- Include specific marine biodiversity disclosure requirements.
- Develop sector-specific guidance for key industries (agriculture, fisheries, tourism, construction).
- Ensure disclosure frameworks capture impacts on Māori cultural values and customary practices.

4.4 Action 6: Private and Māori Land Protection

4.4.1 Critical Evidence of System Inadequacy: This action reveals the fundamental contradiction where Māori are treated simultaneously as "private landowners" requiring government support and as Treaty partners with inherent authority. "He Mātai i te Taiao" documented extensive evidence that this approach fails because it maintains colonial control mechanisms.

4.4.2 Documented Impacts of Current Approach: Research found that current "support" mechanisms actually impede kaitiakitanga:

- **Access Barriers:** As documented in the Raukūmara case study, *"Our communities cannot see the damage occurring in the inaccessible parts of the Raukūmara... Regaining access to our forests is crucial for our people to reclaim our pūrākau and tribal narratives of place and species."*
- **Regulatory Paralysis:** Kaitiaki reported that "Attempts to negotiate the legislation and regulations created a paralysis" with multiple agencies requiring different permissions for the same activities.
- **Knowledge Erosion:** The research found that "Legislative and physical blocks to accessing sites to interact with resources has restricted interaction with those resources – again leading to knowledge erosion over time."

4.4.3 Successful Models When Māori Lead: The case studies demonstrate that when Māori have genuine authority over their lands, remarkable conservation outcomes result:

- **Te Nukuroa o Matamata:** Ōtākou's comprehensive wetland restoration achieved through 20 years of hapū-led management, demonstrating the power of long-term, place-based kaitiakitanga.
- **Ngāti Kuri islands management:** Successfully reclaimed authority over Manawatāwhi and Rangitāhua, treating Crown agencies as manuhiri rather than partners in control.
- **Te Arawa lakes innovation:** Developed cutting-edge mātauranga-based solutions that outperformed conventional approaches.

4.4.4 The Fundamental Problem: As documented in "He Mātai i te Taiao," the issue is not lack of "support" but lack of authority. Kaitiaki emphasized that *"mana whenua needed to stop asking for permission to manage their places, but rather inform the Crown around their positions with regard to biodiversity, and the actions that were taking."*

4.4.5 Complete Restructure Required: This action must recognise that for Māori, the issue is not accessing government support but exercising rangatiratanga. The research showed that successful conservation occurs when:

- **Fee Simple Ownership:** Returned to iwi/hapū with full decision-making authority.
- **Direct Funding:** Long-term resourcing that goes directly to iwi/hapū without Crown intermediaries.
- **Self-Authorisation:** Ability for kaitiaki to approve their own activities without seeking Crown permission.
- **Crown as Technical Partner:** Crown agencies providing expertise when requested, not controlling or directing.

4.4.6 Recommendation: Replace this action with "Enabling Rangatiratanga in Land Management" - establishing pathways for the return of fee simple ownership to iwi/hapū and direct funding mechanisms that recognize them as the primary authorities for conservation in their rohe.

5. Theme 3: Evidence and Knowledge-Based Approach

5.1 Action 7: Monitoring and Reporting Framework

5.1.1 Support with significant enhancements needed:

- Essential for tracking progress and adaptive management.
- Must integrate both western science and mātauranga Māori.

5.1.2 Critical recommendations:

- Establish clear protocols for protecting Māori intellectual property in monitoring data.
- Include community-based monitoring programmes in the framework.
- Ensure marine monitoring receives adequate resources and attention.
- Develop indicators that capture ecosystem health, not just species counts.
- Include urban biodiversity indicators.

5.2 Action 8: Supporting Mātauranga Māori

5.2.1 Completely Inadequate - Requires Fundamental Redesign:

The framing of this action as "supporting Māori to use knowledge systems" reveals the fundamental colonial mindset that continues to plague conservation management. This language suggests Māori need Crown support to access their own knowledge systems, rather than recognising mātauranga Māori as having equal mana and authority.

5.2.2 Critical Problems with Current Framing:

- Positions mātauranga as something to be "supported" rather than recognised as authoritative.
- Maintains Crown control over how mātauranga is used in conservation.
- Fails to create genuine space for mātauranga-based decision-making.
- Ignores successful examples like Te Arawa's ūwhi (flax mat) innovations that occurred despite, not because of, Crown support.

5.2.3 Evidence of System Failure: As documented in "He Mātai i te Taiao," the current system "*privileges Western scientific approaches while marginalising mātauranga-based solutions,*" despite extensive evidence of successful kaitiaki-led initiatives when they are properly resourced and given authority.

5.2.4 Complete Reframe Required: This action must be redesigned to:

- Position mātauranga Māori as having equal mana to other knowledge systems.
- Enable kaitiaki to lead the application of their knowledge without Crown oversight.
- Provide long-term, direct funding to iwi/hapū for mātauranga-based conservation.
- Remove barriers that require tangata whenua to translate their knowledge into Crown-acceptable formats.

5.2.5 Recommendation: Replace this action with "Establishing Mātauranga Māori Authority in Conservation" - enabling iwi/hapū to apply their knowledge systems with full decision-making authority in their rohe, supported by Crown technical and financial resources when requested.

5.3 Action 9: Partnership-Based Delivery Models

5.3.1 Support approach:

- Learning from successful models is essential.
- Partnership approaches can achieve better outcomes.

5.3.2 Enhancement recommendations:

- Include analysis of what makes Treaty partnerships successful.
- Examine community-led conservation models, including urban initiatives.
- Consider how partnerships can be scaled while maintaining local ownership.
- Include evaluation of marine and coastal partnership models.

5.4 Action 10: Nature-Based Solutions Investment

5.4.1 Strongly support:

- Critical for climate change adaptation and mitigation.
- Could unlock significant private sector investment.

5.4.2 Recommendations for strengthening:

- Prioritise blue carbon ecosystems (kelp forests, coastal wetlands, mangroves).
- Include urban nature-based solutions (green infrastructure, urban forests).

- Develop Māori-led nature-based solution projects.
- Consider ecosystem service payment mechanisms.
- Include nature-based solutions for coastal protection and sea level rise adaptation.

6. Theme 4: Capability and Support

6.1 Action 11: Cross-Sector Capability Plan

6.1.1 Strongly support:

- Workforce development is critical bottleneck.
- Cross-sector approach will improve efficiency.

6.1.2 Recommendations:

- Include specific provisions for developing Māori conservation workforce.
- Address marine expertise gaps, particularly in marine ecology and restoration.
- Include community education and citizen science capability building.
- Develop pathways for traditional ecological knowledge holders.
- Consider international exchange and learning opportunities.

6.2 Action 12: Public Awareness and Engagement

6.2.1 Critical action - support with enhancements:

- Addressing the perception gap about biodiversity health is essential.
- Must inspire action while avoiding overwhelming people.

6.2.2 Specific recommendations:

- Develop culturally appropriate messaging that resonates with different communities.
- Include positive stories of successful restoration and species recovery.
- Create clear pathways for people to take meaningful action.
- Use innovative communication methods including digital platforms and citizen science.
- Ensure messaging captures marine biodiversity and urban nature connection.

6.3 Action 13: Emerging Biosecurity Risks

6.3.1 Support with recommendations:

- Early intervention is much more cost-effective than reactive management.
- Climate change will increase biosecurity risks.

6.3.2 Enhancement suggestions:

- Include marine biosecurity as explicit focus area.
- Develop community-based surveillance networks.
- Strengthen integration with existing regional council biosecurity programmes.
- Include climate change risk modelling in horizon scanning.
- Consider impacts of emerging contaminants and pollution.

7. Evidence-Based Alternatives: Learning from Success

Documented Success Stories from He Mātai i te Taiao (2024).

The comprehensive research provides compelling evidence that when iwi/hapū are properly resourced and given genuine authority, they achieve remarkable biodiversity outcomes while strengthening cultural connections:

7.1 Case Study 1 - Te Arawa Lakes Restoration Innovation:

- Developed ūwhi (flax mat) technology that suppresses invasive weeds while providing habitat for koura.
- Achieved community engagement with 2,500 students helping clear invasive catfish.
- Innovation emerged from "*kōrero reo with kaumātua and expert weavers*" (p.17)- demonstrating power of mātauranga-led solutions.
- Success occurred despite, not because of, Crown systems.

7.2 Case Study 2 - Raukūmara Pae Maunga Transformation:

- Ngāti Porou and Whānau ā Āpanui achieved landscape-scale restoration through iwi partnership.
- Observed "*many facets of the ecosystem rather than just focusing on the names of species*" (p.15) - demonstrating holistic Māori approach.
- Created employment and reconnected communities to their forests.
- Success required overcoming Crown restrictions on access and management.

7.3 Case Study 3 - Ngāti Kuri's Te Ara Whānui Programme:

- Grew from \$150,000 to \$15 million over 4-5 years without DOC financial involvement.
- Established research centre that *"informs our kaitiakitanga in our region"* (p.11).
- Developed 140-year strategy demonstrating long-term indigenous thinking.
- Achieved by *"stand[ing] on our own authority"* (p.11) rather than seeking Crown permission.

7.4 Case Study 4 - Ōtākou Wetland Restoration:

- 20 years of hapū-led restoration at Te Nukuroa o Matamata.
- Comprehensive monitoring using both mātauranga indicators and scientific methods.
- Successful pest management across 1800 active traps.
- Clear whakapapa-based restoration framework connecting cultural and biodiversity values.

7.5 Critical Finding: Success Despite the System

7.5.1 Key Research Conclusion: These conservation successes occurred *despite*, not because of, the current system. As documented: *"kaitiaki emphasised that a step-change in the current conservation and environmental systems and processes were needed to realign the sphere of power to iwi and hapū."*

7.5.2 International Recognition of Indigenous Success

The research aligns with global evidence from the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) showing *"a positive trend and relationship between biodiversity and Indigenous Peoples has been similarly exhibited across the globe."*

7.5.3 What These Success Stories Teach Us

1. **Mātauranga Innovation:** Traditional knowledge systems generate cutting-edge solutions when given space to operate.
2. **Community Engagement:** Iwi/hapū-led initiatives achieve remarkable community support and participation.
3. **Long-term Thinking:** Indigenous approaches operate on multi-generational timeframes that match ecological needs.

4. **Holistic Management:** Māori approaches address whole ecosystems rather than single species.
5. **Economic Viability:** Indigenous-led conservation attracts significant funding when enabled to operate independently.

7.5.4 The System Change Required

The evidence demonstrates that genuine biodiversity outcomes require what kaitiaki called for in He Mātai i te Taiao (2024):

- *"Kaitiaki should not need to seek permission from anyone else to collect taonga" (p.10)*
- *"The right for kaitiaki to self-authorise kaitiakitanga actions" (p.36)*
- *"Crown agencies and representatives needed to 'step back' and enable mana whenua to act" (p.x)*

7.5.4.1 Marine Biodiversity

The marine environment requires greater prominence:

- Develop marine-specific actions within each theme.
- Prioritise blue carbon ecosystem restoration.
- Address marine pollution and ocean acidification.
- Strengthen marine protected area networks.
- Include deep-sea and offshore biodiversity.

7.5.4.2 Urban Biodiversity

Urban areas need explicit recognition:

- Include urban biodiversity in national priority mapping.
- Develop nature-positive urban development guidelines.
- Support urban community conservation initiatives.
- Create green corridors connecting urban and rural habitats.
- Include urban nature-based solutions for climate adaptation.

7.5.4.3 Climate Change Integration

Strengthen climate change considerations:

- Develop climate adaptation plans for threatened species and ecosystems.
- Prioritise climate-resilient restoration approaches.
- Include climate change scenarios in all planning.

- Strengthen nature-based solutions for both mitigation and adaptation.

8. Fundamental Recommendations for System Transformation

8.1 Complete Governance Restructure

8.1.1 Current Problem: The proposed actions maintain DOC control while seeking Māori input, perpetuating the colonial system that "has not worked for Māori."

8.1.2 Required Change: Establish genuine co-governance with shared decision-making authority at all levels, as outlined in "He Mātai i te Taiao": "Ensure systems governance and management between the Crown and Treaty partners, hapū, iwi, and kaitiaki, where decision-making at all levels is shared, transparent, consistent, and evidence-based."

8.2 Legislative Reform Timeline

8.2.1 Current Problem: Conservation and wildlife legislation requires tangata whenua to seek Crown permission to manage their own taonga.

8.2.2 Required Change: Establish clear processes and timetables for conservation and wildlife legislative reform that empowers rangatiratanga and enables kaitiakitanga, including allowing iwi/hapū organisations to approve Wildlife Authority permits for their kaitiaki.

8.3 Direct Resourcing Model - Kaitiakitanga Fund

8.3.1 Evidence-Based Recommendation: "He Mātai i te Taiao" provides extensive evidence that current Crown-mediated funding creates dependency and impedes effective kaitiakitanga. The research found that *"Short-term and erratic nature of the current funding model did not allow their people to develop and grow as kaimahi and/or kaitiaki."*

8.3.2 Documented Impact of Short-Term Funding:

- **Skills Loss:** *"gains made with investment (e.g. developing kaimahi capability; reductions in predator numbers; improvements in biodiversity; and/or increased local employment) are often lost when the funding finishes"*
- **Regulatory Burden:** *"engagement with the conservation and regulatory system, including health and safety required extensive time and fiscal resources, and that this regulatory momentum was lost when funding ceased"*

- **Inadequate Timeframes:** *"it is difficult to show positive differences in 3 years when it takes at least 10–50 years to see the outcomes of restoration"*

8.3.3 Successful Model - Ngāti Kuri Example: The research documented how Ngāti Kuri's approach achieved remarkable results: *"it's taken almost two decades to get to the point where their Te Arawhānui programme can thrive and grow... started out as a NZ\$150,000 Vision Mātauranga grant that has grown over the last 4–5 years into \$15 million of research funding with no financial investment and support from DOC."*

8.3.4 Required Features of Kaitiakitanga Fund: Based on the research findings, the fund must:

1. **Direct to Iwi/Hapū:** Remove Crown agencies as intermediaries - *"fiscal investment in kaitiaki services through iwi and/or hapū is needed. This funding must not be pre-determined by any one Crown agency, nor have strings attached"*
2. **Long-term Commitment:** *"support the needs as defined by the kaitiaki... remain in place for extended periods to train kaimahi and kaitiaki... enable future leadership within Māori youth"*
3. **Place-Based Focus:** *"support on-the-ground action as it happens at the local scale, and at a set place"*
4. **Intergenerational Approach:** Recognising that kaitiaki operate on *"cradle to the grave"* timeframes with *"inter-generational vision"*

8.3.5 Scale Required: The research indicates this requires substantial investment, noting that *"Iwi receive relatively little in the way of financial contributions from the public purse (compared with Crown agencies) to engage in management of the environment."*

8.4 Independent Accountability Mechanisms

8.4.1 Current Problem: No consequences for Crown non-compliance with Treaty obligations.

8.4.2 Required Change: Establish independent monitoring of Crown Treaty compliance in conservation management, with clear consequences for agencies that fail to implement genuine partnership.

8.5 Regional Flexibility with National Coordination

8.5.1 Current Problem: One-size-fits-all approaches ignore local tikanga and priorities.

8.5.2 Required Change: Enable regional variation in implementation to reflect local tikanga and priorities while maintaining national coordination through iwi/hapū networks rather than Crown control.

9. Conclusion: Final Recommendations and Political Strategy

9.1 The Evidence is Overwhelming.

The proposed implementation plan for Te Mana o te Taiao perpetuates the same colonial conservation system that has demonstrably failed both tangata whenua and biodiversity outcomes. As kaitiaki across Aotearoa have clearly stated through He Mātai i te Taiao (2024) "***the current governance and management system in New Zealand has not worked for Māori***" (p.35) despite decades of Treaty-compliant language in policies and strategies.

The extensive research documented in He Mātai i te Taiao (2024_ provides overwhelming evidence that:

- Crown-controlled conservation systems actively impede rather than enable effective kaitiakitanga.
- When iwi/hapū are properly resourced and given authority, they achieve significant conservation outcomes.
- Systemic barriers prevent tangata whenua from exercising rangatiratanga over their own taonga.
- Current funding and engagement models maintain colonial dependency rather than enabling partnership.

New Zealand's failure to implement genuine indigenous partnership in conservation violates our obligations under the Convention on Biological Diversity, the UN Declaration on the Rights of Indigenous Peoples, and the Kunming-Montreal Global Biodiversity Framework. The international community increasingly recognises that biodiversity conservation requires indigenous leadership, not consultation.

9.2 The Call for Transformation

This submission calls for the Department of Conservation and government agencies to:

- 1. Acknowledge System Failure:** Recognise that incremental improvements to a fundamentally flawed system will not achieve biodiversity outcomes.
- 2. Enable Genuine Co-Leadership:** Redesign the implementation plan through co-leadership with tangata whenua from the outset.

- 3. Implement Structural Change:** Create legislative, institutional and funding mechanisms that enable rangatiratanga and kaitiakitanga.
- 4. Provide Adequate Resourcing:** Establish long-term, direct funding that enables iwi/hapū to lead conservation in their rohe.
- 5. Ensure Accountability:** Create independent mechanisms to monitor Crown compliance with Treaty obligations.

9.3 The Opportunity

As stated in He Mātai i te Taiao (2024) *"Kaitiaki emphasised that a step-change in the current conservation and environmental systems and processes were needed to realign the sphere of power to iwi and hapū. Moreover, if any progress was to be made in this space, Crown agencies and representatives needed to 'step back' and enable mana whenua to act"* (p.x).

The biodiversity crisis provides an opportunity to create a conservation system that honours Te Tiriti, respects rangatiratanga, enables kaitiakitanga, and achieves meaningful outcomes for te taiao. This requires courage to abandon failed colonial approaches and embrace the transformative change that kaitiaki have been calling for.

9.4 Final Recommendation

TTW urges the Department to withdraw the current implementation plan and begin a genuine co-design process with tangata whenua that addresses the systemic failures documented in He Mātai i te Taiao (2024). Only through this fundamental transformation can we create a conservation system that serves both te taiao and all people of Aotearoa.

The time for cosmetic changes has passed. The evidence for transformation is overwhelming. The question is whether government agencies have the courage to embrace genuine partnership and create the system change that conservation and Te Tiriti demand.

Supporting Documents:

- Lyver, P., Timoti, P., Bellingham, P., & Hutchings, J. 2024. He Mātai I te Taiao: A sense of the environment. Mana whenua perspectives on conditions for enabling kaitiaki-led monitoring and reporting. [Here](#)
- Maranga Ake Ai - (Re)storying Predator Free 2050: A Māori Strategy (draft). Not for Distribution.

This submission represents the collective voice of Te Tira Whakamātaki and our commitment to indigenising conservation in Aotearoa. We acknowledge all tangata whenua who have contributed to and continue to lead environmental protection across the motu.