

Te Tira Whakamātaki Submission

Predator Free 2050 Strategy Review Discussion Document

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1. Mihi

Tēnā koutou katoa,

Te Tira Whakamātaki (TTW) appreciates the opportunity to provide feedback on the Predator Free 2050 strategy review. As a Māori environmental not-for-profit organisation committed to indigenising conservation and environmental protection through Te Ao Māori frameworks, we bring both expertise and deep concern about the current approach to predator management in Aotearoa.

Our submission is informed by our leadership role in developing "Maranga Ake Ai - (Re)storying Predator Free 2050: A Māori Strategy," which represents the collective voice of whānau, hapū, and iwi across the motu regarding the transformation needed within the PF2050 system.

2. Executive Summary

While we acknowledge the ambition and some achievements of PF2050, we believe the current strategy review represents a significant missed opportunity for transformational change.

We support Predator Free goals that restore ecological abundance but achieving these will require far more than technical innovation. It demands system-wide transformation that addresses colonial structures, empowers tangata whenua, and restores balance through whakapapa-based approaches.

The proposed approach perpetuates these constraining colonial conservation frameworks that have consistently failed both tangata whenua and te taiao. The current approach outlined in the discussion document remains overly technocratic, under-theorised, and systemically inequitable.

We note with concern the continued framing of PF2050 as a Crown-led initiative that relies heavily on "mobilising volunteers," "developing tools," and "attracting investment." This reveals a strategy that is **playing defence, not offence**, and is failing to inspire public or Māori confidence. The strategy lacks vision beyond technological solutions and fails to embrace the proven power of **community-led, values-based conservation**, as

demonstrated by PF Wellington, Tū Mai Taonga, and other initiatives despite using them as exemplars.

The strategy's emphasis on "attracting funding" reveals a fundamental flaw. Sufficient resources already existed within government but have been redistributed in the wrong places. It also ignores, conveniently, that external attraction of funds relies heavily on Māori narratives and community efforts, all the while those groups are expelled from real decision-making. The heavy reliance on volunteer labour assumptions throughout all focus areas is unrealistic in today's context and risks exploitation of communities already under economic pressure.

Our key recommendations are:

1. **Reframe PF2050 language and approach** from Crown-led mobilisation to tangata whenua- and community-led transformation.
2. **Fundamentally restructure governance** to centre Treaty partnership and tino rangatiratanga.
3. **Implement a whakapapa-based approach** that considers past, present, and future generations.
4. **Prioritise people power over technological solutions** through substantial investment in communities as well as whānau, hapū, and iwi-led initiatives.
5. **Address systemic underfunding** while redistributing resources equitably to tangata whenua.
6. **Expand the target species list** to include species significant to the communities leading the predator free movements including feral cats, mice, hedgehogs, feral deer and feral wapiti. This approach allows us to respect taonga species at place, such as kiore.
7. **Adopt Maranga Ake Ai as the primary framework** for PF2050, not merely as a Māori add-on.

3. Response to Proposed 2030 Goals

3.1 Focus Area 1 - Mobilise for Action

What we support:

- Recognition that community participation must increase.
- Acknowledgment of the need for Iwi/Hapū leadership.

What is missing: The goals fail to address the fundamental power imbalances that prevent authentic participation. A 25% increase in community participation means little

if the system remains structurally colonial. More critically, the strategy assumes unlimited volunteer labour availability, expecting "tens of thousands" of volunteers to sustain gains, which is unrealistic and potentially exploitative given current economic pressures.

The strategy lacks practical implementation detail: Goals and expected outcomes are presented without any explanation of how they will be achieved. This vagueness makes the strategy unaccountable and unactionable.

What we recommend:

- **Goal revision:** "Iwi/Hapū exercise tino rangatiratanga over PF2050 projects in their rohe, with decision-making authority, not just participation."
- **Add goal:** "Colonial barriers to tangata whenua participation are systematically dismantled, including legislative and policy reform."
- **Add goal:** "A national investment in the Māori biosecurity workforce is established, moving away from reliance on unpaid labour."
- **Add goal:** "Rangatahi-led initiatives and kura-based pest management training programs are funded and supported."

The current approach treats Māori participation as a checkbox rather than recognising our inherent rights and expertise as kaitiaki. The assumption of a 25% increase in volunteer participation is unrealistic and unsustainable, volunteerism is declining, and relying on unpaid labour devalues biosecurity as a skilled profession. Community participation must be resourced, not merely encouraged.

3.2 Focus Area 2 - Maintain the Gains

What we support:

- Recognition that threatened species populations must increase.
- Acknowledgment of offshore island importance.

What is missing: The goals ignore the reality that much of the conservation estate consists of stolen Māori land. There is no mention of land back or authentic partnership in management.

What we recommend:

- **Add goal:** "Tangata whenua have substantive authority over conservation management in their rohe, including co-governance arrangements for DOC-managed lands."

- **Add goal:** "Cultural harvesting practices are restored where species abundance allows, strengthening the connection between healthy ecosystems and healthy people."
- **Add goal:** "Monitoring frameworks expand beyond bird populations to include plant biodiversity, soil health, and freshwater restoration using mātauranga-based indicators co-designed with hapū."

We support continued predator control but object to the assumption that such work can be maintained through community goodwill alone. The plan also lacks mention of native plants, ecosystems, and holistic habitat restoration, representing a narrow focus that misses broader ecological health.

3.3 Focus Area 3 - Innovate for Eradication

What we support:

- Recognition that mātauranga Māori must contribute to eradication outcomes.
- Acknowledgment that diverse tools are needed.

What is concerning: The focus remains heavily on technological solutions while treating mātauranga as an add-on. This perpetuates the "silver bullet" mentality that research shows is fundamentally flawed. The mātauranga Māori goals are the most vaguely worded in the entire strategy, suggesting tokenistic inclusion rather than genuine integration.

The retreat from the 2020 goal of eradicating predators from ALL offshore islands to just 75% of the network area represents concerning ambition reduction without explanation.

What we recommend:

- **Goal revision:** "Mātauranga Māori leads tool and approach development, with science working in partnership rather than dominating."
- **Add goal:** "Kaupapa Māori R&D and Indigenous innovation hubs are funded and established."
- **Add goal:** "Feral cats are included in the target species list, acknowledging the risk of ecological imbalance if excluded."
- **Add goal:** "Innovation funding is redistributed so that 50% goes directly to whānau, hapū, and iwi-led initiatives."

TTW supports innovation but cautions against over-investment in speculative technologies at the expense of proven, people-based solutions. Mātauranga Māori

contributions are severely underexplored and underfunded relative to technological approaches, despite earlier promises by the Department and Treasury to invest in them.

3.4 Focus Area 4 - Prepare to Accelerate

What we support:

- Recognition that Treaty obligations must be upheld.
- Acknowledgment that non-Crown funding is needed.

What is missing: There is no recognition that the current system is fundamentally flawed and requires transformation, not just scaling up. The focus on "attracting funding" reveals a critical misunderstanding, adequate government resources existed but required redistribution in equitable ways. This approach to funding demonstrates the strategy's defensive rather than transformational mindset.

Critical absence: No mention of policy or legislative reform needed to enable authentic Treaty partnership and tangata whenua authority.

What we recommend:

- **Goal revision:** "PF2050 demonstrates that indigenised conservation models deliver superior outcomes for both biodiversity and cultural wellbeing."
- **Add goal:** "Crown baseline funding replaces the competitive 'attracting investment' model, ensuring equitable and sustained support for communities leading this work."
- **Add goal:** "An Indigenous Investment Fund for PF2050 is co-developed, tied to environmental, cultural, and wellbeing indicators."

This focus area is fundamentally flawed. The strategy proposes to "prepare" in 2025 for what was promised in 2016, the time to accelerate was yesterday. The emphasis on investor confidence reveals a funding model that is **reactive, not strategic**, and deeply inequitable. The strategy needs to be co-designed, developed and led if it wants to seriously "attract investment," after all, the bulk of the philanthropic investment to date has been interested in the Māori narrative and community action elements. The Crown's baseline funding needs to go to communities already leading this work.

4. Fundamental Issues with the Current Approach

4.1 Colonial Framework Perpetuation

The consultation document, while mentioning Treaty partnerships, fundamentally maintains colonial structures. It treats tangata whenua as stakeholders to be consulted rather than Treaty partners with inherent rights.

The problem: The strategy was developed without genuine partnership and now seeks to retrofit Māori involvement.

The solution: Adopt Maranga Ake Ai's three pou framework:

- **Pou Tuatahi:** Te Tiriti as foundation for tino rangatiratanga and kaitiakitanga.
- **Pou Tuarua:** (Re)storying conservation to put taiao first.
- **Pou Tuatoru:** Decision-making that benefits future generations.

4.2 Narrow Focus vs. Holistic Approach

The strategy's continued focus on three target species conflicts with Te Ao Māori holistic approaches to environmental management.

The problem: Targeting individual species without considering ecosystem relationships and whakapapa connections.

The solution: Implement ecosystem-focused strategies that consider the whakapapa of all species, including those currently labelled as "pests."

4.3 Measurement and Accountability Gaps

The strategy provides goals and expected outcomes but fails to explain how progress will be measured or what specific activities will achieve these outcomes. This lack of implementation detail makes the strategy unaccountable and suggests it may repeat the vague promises of previous iterations without delivering concrete change.

The problem: Goals without measurement frameworks or implementation pathways.

The solution: Develop comprehensive monitoring frameworks with tangata whenua-controlled indicators and clear implementation responsibilities.

Despite evidence that technology alone cannot solve this challenge, the strategy continues to prioritise innovation over people power.

The problem: Expensive technological solutions that may never be deployable at scale.

The solution: Invest primarily in community-based conservation, particularly tangata whenua-led initiatives that have demonstrated success.

5. National Target Species List

5.1 Language and Bias in Species Classification

We are deeply concerned about the political and cultural biases embedded in how species are classified and labelled within DOC and PF2050. The Department and strategy reference the Wild Animals Management Programme, a programme that describe deer and wapiti, species beloved by recreational hunters as 'wild,' while using "feral" for stoats and cats that are targeted for eradication. This selective language reveals how conservation decisions are influenced by recreational and cultural preferences rather than objective biodiversity impact assessments.

Most concerning is the government's desire to design of wapiti as a "herd of special interest," and to potentially expand that to other herds or animals, in order to blatantly and explicitly exclude them from predator control programs. This is despite the devastating impacts they knowingly have on native ecosystems. This political protection of introduced species that cause massive ecological damage while targeting others reveals the fundamental inconsistencies in the current approach.

5.2 Expand Target Species to Include All Harmful Introduced Mammals

Noting the above, TTW recommends expanding the target species list to include all introduced mammals causing significant biodiversity harm, including:

- Feral deer species (red deer, sika deer, etc.)
- Feral Wapiti/elk
- Feral Tahr
- Feral goats
- Feral Wallabies

These species cause extensive damage to native forests, alpine ecosystems, and freshwater environments. Their exclusion represents a failure to prioritise ecological integrity over recreational hunting interests.

5.3 Support for Including Feral Cats

We strongly support including feral cats on the national target species list. Feral cats cause devastating impacts on native biodiversity, and their exclusion undermines the credibility of PF2050. The strategy document acknowledges that PAPP toxin is close to registration for cat control, making their continued exclusion even more puzzling.

The strategy's approach of presenting feral cats as a critical addition then citing resource constraints as the reason for exclusion appears disingenuous. If PF2050 is serious about biodiversity protection, feral cats must be included now, not delayed another five years.

However, inclusion must be coupled with:

- Comprehensive planning for domestic cat management.
- Community education and support programs.
- Acknowledgment that effective cat management requires regulatory frameworks.

5.4 Respect for Kiore as Taonga

We appreciate the recognition that kiore are taonga to some iwi. This acknowledgment must extend to genuine partnership with iwi who maintain kaitiaki relationships with kiore.

Key principle: No decisions about kiore management should be made without the free, prior, and informed consent of relevant iwi.

5.5 Expand Consideration to Mice and Hedgehogs

The current approach of "advancing understanding" while excluding mice and hedgehogs from active management is inadequate. These species cause significant biodiversity impacts that undermine PF2050 objectives.

6. Critical Gaps in the Strategy

6.1 Implementation and Measurement Deficits

The strategy presents goals and expected outcomes without explaining how they will be achieved or measured. This fundamental flaw makes the strategy unaccountable and suggests it may repeat previous patterns of promising transformation while delivering incremental change.

Our recommendation: Develop comprehensive implementation frameworks with specific activities, timelines, and measurement criteria for each goal.

6.2 Funding Misunderstanding

While the document acknowledges DOC's underfunding, the strategy's emphasis on "attracting investment" reveals a fundamental misunderstanding. Adequate resources exist within government but require redistribution rather than external attraction. The focus on attracting private funding deflects from government responsibility for Treaty obligations and environmental protection.

Our recommendation: Develop a dedicated funding stream for tangata whenua-led conservation that ensures adequate government investment rather than relying on uncertain private funding. This must be led by all of government, it should not land solely on the Department of Conservation.

6.3 Jobs for Nature Legacy and Workforce Crisis

The strategy ignores the devastating impact of Jobs for Nature conclusion, which has left many skilled kaitiaki and citizens unemployed (~1800). This represents a massive loss of conservation capacity and demonstrates the folly of relying on short-term funding for long-term environmental challenges.

Our recommendation: Establish permanent funding for tangata whenua and community conservation workforce, recognising conservation as core to cultural survival and national environmental goals.

6.4 Policy and Legislative Reform Absence

The strategy makes no mention of the policy and legislative changes needed to enable authentic Treaty partnership and tangata whenua authority. Without addressing these structural barriers, the goals around Treaty partnership remain empty promises.

Our recommendation: Commit to specific legislative and policy reforms that enable tangata whenua to exercise tino rangatiratanga over conservation in their rohe.

6.5 Data Sovereignty Oversight

There is no mention of Māori data sovereignty, despite the strategy's heavy reliance on monitoring and data collection.

Our recommendation: Implement the Māori PF2050 Data Sovereignty Framework developed by TTW to ensure tangata whenua control over data and mātauranga.

7. Recommended Approach: Adopting Maranga Ake Ai

Rather than treating Maranga Ake Ai as a parallel "Māori strategy," we recommend adopting it as the primary framework for PF2050. This would demonstrate genuine commitment to Treaty partnership and recognition that indigenised conservation delivers superior outcomes.

Key Elements to Adopt:

1. **Whakapapa-based decision making** that considers seven generations.
2. **Focus areas that prioritise system transformation** over species targets.
3. **Investment in tangata whenua capacity** and leadership.
4. **Recognition that healthy ecosystems support healthy communities.**
5. **Long-term thinking beyond 2050.**

Implementation Requirements:

1. **Legislative and policy reform** to enable tangata whenua authority.
2. **Substantial funding redistribution** to whānau, hapū, and iwi, and communities.
3. **System transformation** rather than incremental change.
4. **Anti-racism training** for all system participants.
5. **Authentic partnership structures** at all levels.

7.1 Māori-Led Success: Evidence for Transformation

We refer readers to the Māori-led case studies within *Maranga Ake Ai*, which demonstrate proven alternatives to the current approach:

Tū Mai Taonga (Aotea): A successful iwi-led model that combines pest removal with job creation, tikanga, and community development. This project created 24 jobs, delivered 130 training sessions, held 127 landowner consultations, and installed over 1,800 devices while remaining culturally grounded, demonstrating that community-led approaches achieve both ecological and social outcomes.

Whakapapa Pest Control Framework: Developed by Tūhoe, Moriori, and others, this framework demonstrates a holistic, whakapapa-based methodology for pest management that considers the interconnectedness of all species rather than targeting individual "pests."

These examples prove that Māori-led conservation delivers superior outcomes when properly resourced and empowered. The current strategy fails to learn from these

successes, instead maintaining Crown-led approaches that have consistently underperformed.

8. Economic and Social Benefits

The current strategy inadequately addresses the broader benefits of transformed conservation approaches. International evidence shows that Indigenous-led conservation delivers superior outcomes at lower costs.

8.1 Key benefits of adopting Maranga Ake Ai approach:

- **Cost effectiveness:** Indigenous and community stewardship "often achieve greater conservation results and sustain more biodiversity than government protected areas" at significantly lower per-hectare management costs.
- **Social cohesion:** Conservation work that connects people to place builds stronger communities.
- **Cultural revitalisation:** Environmental restoration supports language, tikanga, and mātauranga transmission.
- **Economic development:** Conservation creates sustainable employment in rural and urban areas.
- **Climate resilience:** Diverse ecosystems better withstand climate change impacts.

8.2 Support Needed for TTW and Similar Organisations

The consultation asks about support needed for involvement. TTW requires:

1. **Core funding for organisational capacity**, not just project funding
2. **Recognition as Treaty partners** with decision-making authority, not just consultation rights.
3. **Direct funding relationships** that bypass colonial bureaucratic processes.
4. **Intellectual property protection** for mātauranga Māori contributions.
5. **Anti-racism commitments** from all system participants.

Barriers to Address:

1. **Systemic racism** within conservation institutions.

2. **Underfunding** that forces competition between environmental groups.
3. **Colonial legislation** that limits tangata whenua authority.
4. **Consultation fatigue** from endless reviews without meaningful change.
5. **Knowledge extraction** without reciprocal benefit.

9. International Context

New Zealand's PF2050 goals are being watched internationally. The proposed approach risks demonstrating that even a progressive, small nation cannot effectively implement Indigenous-led conservation.

Opportunity: Adopting Maranga Ake Ai would position New Zealand as a global leader in indigenised conservation, supporting our international reputation and trade relationships.

Risk: Continuing colonial conservation approaches undermines our credibility in international Indigenous rights forums and sustainability commitments.

10. Summary of Key Recommendations

Based on our analysis, Te Tira Whakamātaki recommends the following transformational changes:

1. **Shift the PF2050 funding model** from competitive philanthropy to baseline and equitable Crown investment that recognises government responsibility for Treaty obligations.
2. **Mandate Māori co-leadership** across all PF2050 processes, not just consultation or participation.
3. **Stop relying on volunteers** invest in a paid biosecurity and kaitiaki workforce that recognises conservation as skilled, essential work.
4. **Create a PF2050 monitoring and evaluation framework** co-designed with Māori, grounded in mātauranga and holistic ecosystem indicators.
5. **Include feral cats immediately** on the target species list rather than delaying for another five-year cycle.
6. **Adopt Maranga Ake Ai's whakapapa-based approach** as the primary framework for transformation.
7. **Establish permanent funding streams** for tangata whenua-led conservation that bypass underfunded government agencies.

11. Conclusion

The PF2050 strategy review presents a critical choice, continue with incremental adjustments to a failing colonial system, or embrace the transformational change that both biodiversity and tangata whenua require.

Te Tira Whakamātaki urges the Department of Conservation and government to demonstrate genuine Treaty partnership by adopting Maranga Ake Ai as the primary framework for PF2050. This would represent the kind of bold action needed to address the biodiversity crisis while upholding Te Tiriti obligations.

The evidence is clear: Indigenous-led conservation delivers superior outcomes for both ecosystems and communities. The question is whether New Zealand has the courage to embrace this evidence and transform its conservation approach accordingly.

We stand ready to work in partnership to implement these recommendations and create a conservation system that truly serves both te taiao and tangata whenua.

Kua tae mai te wā - the time has come.

Supporting Documents:

- Maranga Ake Ai - (Re)storying Predator Free 2050: A Māori Strategy (draft)
- Māori PF2050 Data Sovereignty Framework
- There Is No Silver Bullet: We Need People Power to Achieve Predator Free 2050 (draft)

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 Maranga Ake Ai and continue to lead environmental protection across the motu.