Submission

Department of Conservation
Predator Free 2050 Strategy Public Consultation
30 June 2025

MCGUINNESS INSTITUTE
TE HONONGA WAKA

1.0 Introduction

The McGuinness Institute (the Institute) welcomes the opportunity to submit on New Zealand's Predator Free 2050 Strategy (the Strategy). We would like to thank the Department of Conservation (DOC) for inviting feedback on the Strategy.

The Institute would welcome the opportunity to make an oral submission if possible. Please do not hesitate to contact us if you have any further questions on the ideas discussed below.

Protecting New Zealand's flora and fauna for future generations is critical, and designing a strong predator free strategy is an essential part of this. Note the Institute has also submitted on DOC's Biodiversity Strategy, and recommends these submissions are read alongside one another. We note some concerns with the submissions in Section 1.2 below.

The Institute's submission includes:

1.1 About the Institute

The Institute was founded in 2004 as a non-partisan think tank working towards a sustainable future for Aotearoa New Zealand. Project 2058 is the Institute's flagship project focusing on Aotearoa New Zealand's long-term future. Because of our observation that foresight drives strategy, strategy requires reporting, and reporting shapes foresight, the Institute developed three interlinking policy projects: *ForesightNZ, StrategyNZ* and *ReportingNZ*. Each of these tools must align if we want Aotearoa New Zealand to develop durable, robust and forward-looking public policies. The policy projects frame and feed into our research projects, which address a range of significant issues facing Aotearoa New Zealand. The 11 research projects are: *CivicsNZ, ClimateChangeNZ, EcologicalCorridorsNZ, GlobalConflictNZ, OneOceanNZ, PandemicNZ, PublicScienceNZ, ScenariosNZ, TacklingPovertyNZ, TalentNZ* and *WaterFuturesNZ*.

1.2 Concerns

1.2.1 Over this submission

We are aware that three Predator Free related documents currently exist (see list below).

1. Towards a Predator Free New Zealand (2020) (often referred to the PF2050 strategy, its time horizon is 2020 to 2050).
2. Predator Free 2050 Interim Implementation Plan (2024) (the time horizon is 2024 to 2030).
3. Predator Free 2050: Strategy review discussion document (the time horizon is 2024 to 2030).

Our submission responds to the third document, which appears to mention only the first document, not the second.

We note that the purpose of the consultation document states:

> It has been 5 years since the first national PF2050 strategy: Towards a Predator Free New Zealand / Predator Free 2050 Strategy and it is now time for a scheduled review. PF2050 has seen huge progress thanks to the hard work of people all across New Zealand. Government, Iwi and hapū, businesses, NGOs, communities, and individuals all have a role to play in achieving the goal. We are seeking valuable input from New Zealanders to help us **craft the strategy for the next 5 years**. There are two areas we'd like your feedback on:
>
> 1. The new set of goals across our four focus areas to **achieve by 2030**. These will act as indicators of our progress and direct our efforts (see page 16).
> 2. The proposal to retain the current national target species list (possums, ship rats, Norway rats, kiore, weasels, stoats and ferrets). We will continue to advance our understanding of other mammalian predators (feral cats, mice and hedgehogs) (see pages 21–23).[1] [bold added]

This raises four questions:

Q1: Is Predator Free 2050 Interim Implementation Plan (2024) still envisaged to continue (or is the consultation document considered a replacement)? Is that why Interim was included in the title?

Q2: Is the review (the third document) a review of both the strategy (PF2050) and the implementation plan?

Q3: Is this review calling into question both the strategy (PF2050) and the implementation plan, and is DOC asking for consultation on whether the current strategy and implementation plan are working?

Q4: When the Institute completed the *2024 GDS Index*, we considered merging the PF2050 (2020) with the Predator Free 2050 Interim Implementation Plan (2024) but decided that, given the different purposes of both documents and the different time horizons, it was more appropriate to publish them separately. We would like to know if DOC would agree?

We consider that DOC needs to be careful with its language, particularly when submissions are open to public involvement. There is a significant difference between a strategy and a plan (although there are areas that they overlap). A strategy is a strategic document. It explores what options exist and why one option is selected over another. In other words, it is the means to the end objective. In contrast, the detail of how to implement the agreed strategy becomes a plan. For example, the allocation of resources and allocation of tasks at specific points in time is a plan. In contrast, a review can be a review of a strategy or a review of a plan or both.

Given the above observations, we are not confident that we have responded appropriately, as it is unclear what the purpose of the documents are and how they fit together. For consultation which aims to get the views of the public, this creates confusion and may result in submissions that do not provide DOC with the answers they are after.

1.2.2 About transparent use of AI

The Institute recently prepared and published Think Piece 43 – Unlocking Government documents with AI.[2] Based on this work we learned a great deal about the risks and opportunities of applying AI is a government setting. Given these insights, the Institute now has a policy of requesting every organisation to:

- clarify how AI is expected to be used to analyse and report on public submissions when inviting submissions from the public
- prepare a public report on how AI was used to collate ideas and present the report to decision-makers when writing up submissions from the public.

Key information in both cases should include: (i) the AI tool (such as Google NotebookLM), (ii) the number of submissions that were read in full or in part by a human versus those that were only read by AI, (iii) how the AI results were verified as correct (i.e. the audit process), and (iv) a summary of the errors found as a result of the review process.

Furthermore, AI should be used for the benefits of citizens and submission processes should be reconsidered given this new tool.

1.3 Summary

Once our native species are lost, we cannot get them back. Protecting New Zealand's species and their habitats from predators is an intergenerational project and it is important we get this right:

> New Zealand's plants and animals are unique – most of them are found nowhere else on Earth. Our native species evolved separately from the rest of the world for millions of years. During this time, they developed unique characteristics, and now species like ground-foraging bats, giant carnivorous land snails and alpine-dwelling parrots all call New Zealand home.
>
> Without native land mammals, wildlife did not develop defences to protect themselves against the predators that arrived with humans, including rats, stoats and possums. These introduced mammals

> have taken a disastrous toll on native wildlife. **By one calculation, rats, stoats, possums and other predators kill approximately 25 million native birds every year. New Zealand has the highest proportion of threatened species anywhere in the world.[3]** [bold added]

We need to design and implement a Strategy that prepares for the risks, opportunities and changes over the long term. It is important this Strategy provides certainty for all stakeholders so they can commit to plans and uphold them over the long term, even as governments and Ministers change.

This Strategy also needs to consider how the environment is interconnected and is responsive to the combined crises of predators alongside the issues of climate change and biodiversity. Rather than focusing on individual flora and fauna, we need to consider the best way to protect the entire ecosystem across land and sea.

New Zealanders are passionate about protecting our environment, and controlling predators is an important part of this. New Zealand is unique in our geographical isolation, beautiful natural environment, strong community, economic reliance on exports, and powerful international brand. Unlike many other countries, we have an opportunity to develop and maintain a strong reputation as a leader in environmental stewardship and protection, whilst ensuring the country is a safe place for people, flora and fauna to thrive.

2.0 Specific responses to the proposed predator free goals across four focus areas

In this section, the four predator free goals for 2030 and their draft goals – taken directly from DOC's Strategy review discussion document – are in ***bold blue italics***, and the Institute's responses are in black text below.

Focus area 1 – Mobilise for action: Inspire New Zealanders and empower communities to take action

Draft goal 1: Community participation in predator control activities has increased by 25% (from 2025 baseline), driven by active support (such as funding, resources, expert advice and training to ensure their success).

The Institute believes that community participation would be improved by developing employment opportunities and educational initiatives across New Zealand. These opportunities are outlined below:

1. Develop predator free employment opportunities

We recommend further programmes are developed to attract talent to nature-facing jobs across New Zealand. It is especially beneficial to provide meaningful work for people in regions or who do not have traditional qualifications. Providing long-term public funding to biodiversity and conservation projects will allow for people to plan long-term projects, which will attract and retain staff.

The Institute supports Forest & Bird's suggestion that programmes such as 'Jobs for Nature' are an essential part of building New Zealand's biodiversity capability and attracting talent to the conservation industry.

> Capability gaps are a direct consequence of the Government's failure to prioritise our environment by defunding our universities and public sector agencies, causing subject matter experts to lose their jobs. The Jobs for Nature programme engaged and upskilled people who would not have normally considered a job in conservation, or had the opportunity, due to not having the specialist knowledge and experience. Losing Jobs for Nature meant losing those upskilled people and not having new people coming through the conservation system to fill gaps. Mobilising all New Zealanders is fundamental to addressing the scale of the biodiversity crisis we face. However, it is paramount to prioritise and provide accessible and meaningful opportunities for New Zealanders to engage with nature first-hand, as this is crucial for building the emotional connections and sense of place.[4]

2. Improve predator free education

Another important part of making New Zealand predator free is through public education. New Zealanders, especially the next generation, need to be aware of the benefits of a predator free New Zealand:

> If Predator Free 2050's aim was achieved, we can expect benefits like:
>
> - endangered native species recovering and thriving,
> - ecosystems becoming healthier and more resilient,
> - increased food security,
> - reduced costs from predator control and
> - increasing public and stock health as spread of disease is better managed.
>
> Generations of New Zealanders will feel more connected to nature, and New Zealand would see a boost in international standing and our economy.[5]

It would be great to see how this Strategy plans to work with schools to educate and share knowledge with the next generation, many of whom grow up in urban areas with reduced access to nature.

3. Incentivise and support predator control on private and Māori land
There is a great opportunity to support people who are undertaking conservation and biodiversity protection on private and Māori land. People are doing great work across New Zealand but often these projects are undertaken completely separately to DOC. We suggest consultation with key stakeholders and private land owners, especially Māori and the agricultural community, will be critical to ensure this is successful. It will also allow for key learnings to be shared.

Draft goal 2: Iwi/Hapū leaders are supported and enabled to actively participate in PF2050 projects, including in leadership and decision making.

The Institute acknowledges Māori have a critical role as tangata whenua in Aotearoa and that we do not purport to represent or account for those perspectives in this work. The perspectives of Māori communities must be considered in biodiversity management, including how to preserve traditional practices and access to important cultural areas.

It is noted further consultation is required to understand Māori cultural connections to the land, and how this Strategy will impact them. It is recommended any new biodiversity and predator control policies and strategies are formulated in close collaboration and coordination with Māori stakeholders.

Focus area 2 – Maintain the gains: Continue essential predator control to create safe spaces for native species and improve biodiversity outcomes

Draft goal 1: National and community-led predator control projects are demonstrating significant increases in the population trends of native species that are highly threatened by predators.

N/A

Draft goal 2: New Zealand's offshore predator free island network is managed to best practice biosecurity standards.

N/A

Focus area 3 – Innovate for eradication: Advance tools and techniques to effectively and efficiently eradicate predators in rural, urban and conservation areas

Draft goal 1: Rats, mustelids and possums are eradicated from a major city, and there is a tested and proven blueprint for scalable deployment to other urban environments.

N/A

Draft goal 2: Mātauranga Māori is making demonstrable contributions to eradication outcomes.

N/A

Draft goal 3: Predator eradication is complete or underway across 75% of New Zealand's offshore island network area (this includes the Maukahuka Pest Free Auckland Island project).

N/A

Draft goal 4: The eradication toolbox has expanded to include at least one:

- ***species-specific toxin that is registered and available for use in New Zealand***
- ***bait that is registered for use in New Zealand to target introduced mammalian predators***
- ***laboratory proof of concept for a breakthrough science solution that helps achieve affordable and scalable rat and / or stoat elimination.***

We recommend this goal includes supporting research and development in technology and how this can improve both predator control, and public education and support of DOC's work. Artificial Intelligence (AI), in particular, is improving quickly and will improve efficiencies across a number of areas.

Refer to **Recommendation 1: Incorporate futures-thinking, including AI, with research and development** for more detailed information on this.

Focus area 4 – Prepare to accelerate: Develop a clear, evidence-based plan to achieve the PF2050 goal that shows the benefits for New Zealand and attracts the funding required to achieve it

Draft goal 1: PF2050 has attracted significant investment from non-Crown funders, supported by clear analysis of the costs and benefits associated with achieving a predator free New Zealand.

It would be useful to see where DOC is hoping to get external investment and what research has been done in this area. Predator control is a significant expense and it is risky to leave it in the hands of private investors. Biodiversity and protection of our native species shouldn't be 'monetised' as it is the responsibility of New Zealanders to protect.

External funding comes with risks and costs:

- It is likely to compound the issue of 'selective conservation' where species that are appealing to the public are more likely to receive funding. Species that are predators to native species but are well-loved, such as cats, are less likely to receive funding and support from the public.
- Reliance on external funding makes long-term planning difficult, and biodiversity conservation is a long-term issue.
- Private investment is much more likely to change as a result of changes in the economy, and we need New Zealand's biodiversity strategy to be consistent regardless of external factors.
- Private investment may come with terms and conditions which are inconsistent with the goal of protecting New Zealand's biodiversity as a whole.

Introducing private sector disclosures, reporting and investment comes with risks that must be managed, and the system must be transparent and accountable. The financial details should be publicly available for transparency. It is recommended New Zealand looks to international

examples to see what our trading partners are doing in this space and what might work best for our environment.

It is critical to make sure any private sector involvement is no-strings-attached. Introducing private sector disclosures, reporting and investment comes with risks that must be managed, and the system must be transparent and accountable. The financial details should be publicly available for transparency. It is recommended New Zealand looks to international examples to see what our trading partners are doing in this space and what might work best for our environment.

We recommend research is undertaken to understand what quantity of private investment is likely, and what the conditions and costs of it will be. It is also prudent to ensure that DOC are well-resourced so they can cover their conservation costs without relying on external investment which may never arrive.

Draft goal 2: Iwi / Hapū are satisfied that PF2050 projects are realising or supporting their aspirations in their rohe (areas).

N/A

3.0 Specific responses to the proposal to retain the current national target species list

Discussion question 1: What do you think of the proposed approach to retain the current PF2050 national target species list?

We understand DOC have resourcing issues and hence are proposing to stick with the current target species list of possums, rats and mustelids (including ferrets, weasels and stoats). However, we recommend the three remaining mammalian predators (feral cats, mice and hedgehogs) should be still considered as part of this Strategy. Focusing on seven of ten mammalian predators fails to reflect the interconnected nature of New Zealand's environment, and that each individual habitat and species has an impact on the others. Prioritising certain species and not others may have impacts down the line, especially when considering the unknowns caused by a changing climate.

Furthermore, with climate change and natural disasters occurring across New Zealand, it is difficult to predict which species and habitats will come under pressure, and which will thrive in new conditions. We recommend, as do many experts, scientists and environmentalists, that New Zealand's natural system is looked at as interactive: an entire ecosystem, rather than focusing on individual flora and fauna.

If we are to remove some predators and not others, we are creating conditions for the remaining ones to thrive, which will cause further damage to our native species. We therefore recommend all three additional species are included. However, if only one species were to be added to the list, we would recommend it is the species that causes the most damage to native species and their habitats – in this case, the feral cat:

> The PF2050 project was created to tackle 7 of the 10 mammalian predator species in New Zealand – possums, ship rats, Norway rats, kiore, weasels, stoats and ferrets. These species were chosen because they are considered the most harmful and the most realistic to eradicate by 2050.
> Over the past 5 years, people have raised concerns that by leaving some predator species off the PF2050 national target species list (primarily feral cats), we're missing a chance to maximise the benefits for native biodiversity.
> Three mammalian predators are missing:
>
> - **Feral cats: These skilled hunters are among the most damaging introduced predators in New Zealand's ecosystem. With their high prey drive, they have a major impact on native birds, bats and lizards.**
> - Mice: The negative impacts of mice on native biodiversity are well documented – they prey on smaller creatures like invertebrates, as well as reptiles and birds. There is also concern about how mouse populations respond to the eradication of rats.
> - Hedgehogs: While there may be less public awareness of the impacts of hedgehogs, they pose a serious threat to native invertebrates, reptiles and ground-nesting birds. [bold added][6]

Public support for control of feral cats is growing, and in 2023/24, the Environment Select Committee considered a petition and recommendation for legislation to be developed to manage cats.[7] There are a number of concerns that the absence of feral cats from the target species list creates a significant gap in the overall Strategy, which is likely to undermine its success. If some predators are controlled and feral cats are allowed to thrive, our native species will suffer. In New Zealand conditions, cats are apex predators who excel at hunting native species:

> Cats are highly skilled hunters and are known to kill all kinds of native wildlife including birds, bats, lizards and insects.

> **Cats have been implicated in the eradication of many species, including the Stephen Islands Wren. There is also a well reported case where one feral cat killed 102 endangered native short tailed bats in one week.**
> Cats are an apex predator in Aotearoa — this means nothing preys on them and therefore we need to try and minimise their impact on our ecosystems as much as possible.[8] [bold added]

Adding additional species, including feral cats, to the predator free strategy will mean the Strategy can be coordinated across New Zealand and is much likelier to have success at protecting our native species. Increasing the scale of this Strategy will require greater resources to undertake work on the ground, as well as funding for research and development. We recommend that DOC, and related parties, funding is increased to undertake this important work.

Discussion question 2: Are there alternative approaches that PF2050 could be taking? If so, what are they and why?

See above.

Discussion question 3: What do you see as the benefits and risks of not including feral cats on the PF2050 national target species list at this time?

See above.

4.0 Recommendations to improve the proposed approach

Recommendation 1: Incorporate futures-thinking, including AI, with research and development

Any strategy that will work in the future needs to consider the speed at which technology, especially AI, is changing. Research and development of technology in this area is an opportunity to improve New Zealand's predator free Strategy and to make implementation, monitoring and reporting more efficient and more affordable. For instance, the use of drones has improved opportunities to monitor and capture predators across the country. There also may be opportunities to involve and educate the public of predator free efforts through developing and introducing new technology such as cameras and apps.

Public policy and strategy should be designed in ways that anticipate, and prepare for, how AI can be implemented in digital systems. In May 2025, the Institute explored how AI will impact government document documents in *Think Piece 43: Unlocking Government documents with AI.*[9] This think piece explores what AI could look like when applied to Government documents, and in particular how AI might provide taxpayers more value in terms of delivering quality products and services.

Improvements are possible not just in terms of the delivery of goods and services to citizens, but also in terms of delivering a more interconnected and aligned policy ecosystem. Any new Strategy should consider this and we recommend this Strategy includes research and development for developing a predator free New Zealand. The use of AI, or other new technology, must be clearly defined and transparently shared with the public to maintain trust and democracy. The Strategy should also include how it will manage risks from the introduction of any new technology.

Recommendation 2: Incorporate plans for minimising impacts on the climate and protecting the environment from climate change

As well as risks from predators and the biodiversity crisis, New Zealand's environment is under significant pressure and there is an urgent need to adapt to climate change as well as to reduce carbon emissions to prevent further biodiversity loss. Climate change is one of the most serious risks facing New Zealand, and this Strategy should include detail on how it will respond to a changing climate and how it will help slow the impacts of climate change. Some predators may suffer from a changing climate and natural disasters, and some may thrive. It would very useful to include some research and development into this area so we can prepare for the future impacts of climate change and what this means for predator control in New Zealand.

Like the rest of the world, New Zealand is experiencing a changing climate and is facing the impacts of rising temperatures, changing weather patterns, and increased occurrences of natural extreme weather events. These changes are serious and will continue to increase in the future, impacting the next generation and beyond. New Zealand needs to both reduce our greenhouse gases and prepare for future climate-related risks. Ministry for the Environment has noted the impacts are increasing in frequency and severity across the country:

> Aotearoa New Zealand experienced its second warmest year on record in 2023, just shy of the record set in 2022, with an average temperature of 13.6 °C. Climate change projections for Aotearoa show further warming is projected by 2090, with more hot days and fewer cold days across the country over the next decades.[10]

Recommendation 3: Increase resources allocated for environmental monitoring and reporting, to establish baselines and monitor species health

A lack of baseline environmental data is a consistent issue that has come up in the Institute's research and work on conservation in New Zealand, particularly in terms of marine environments, but also on land. As is commonly said by scientists, we cannot protect what we do not know. The more information we have on our native species and their habitats, the better placed we are to make conservation, planning and management decisions to protect the environment for future generations.

Without this information, we cannot offer protection to the species and ecosystems which need it. It is therefore essential this Strategy includes investment in science and research to set priority indicators for the environment and our native species.

We recommend these targets are:

- developed in consultation with all affected stakeholders (especially Māori)
- consistent with our international partners (e.g. Australia, UK, etc.)
- publicly available, and
- revisited regularly.

We acknowledge DOC is stretched for resources, however, we highly recommend New Zealand invests more resources in monitoring and researching our native species, their predators and their habitats. Species health and population levels should be analysed annually so that a precautionary management approach can be applied where necessary, and so that we can understand which species are most at risk. This can only be achieved when we have sufficiently detailed information on which to make decisions.

In a world with a changing climate, political uncertainty and global trade wars, this Strategy brings into question whether the government is adequately considering future challenges. The issues faced by our environment are complex and interconnected, and currently decisions must often be made with a lack of information. We need to improve our environmental monitoring and reporting so that we can make better decisions and future-proof our Strategy.

Recommendation 4: Incorporate New Zealand's international commitments

New Zealand is party to a number of international commitments for the environment and climate change. This Strategy should ensure these obligations are met. It is important we stand by these agreements to maintain our international relationships, our international reputation, and the 'clean, green' image of our export and tourism industries.

The United Nations Biodiversity Conference (COP15) ended in Montreal, Canada, on 19 December 2022 with a landmark agreement to guide global action on nature through to 2030. The agreement includes concrete measures to halt and reverse nature loss, including putting 30% of the planet and 30% of degraded ecosystems under protection by 2030.

The Global Biodiversity Framework (GBF) also features 23 targets to achieve by 2030, including effective conservation and management of at least 30% of the world's lands, inland waters, coastal areas and oceans, with emphasis on areas of particular importance for biodiversity and ecosystem functioning and services. The GBF prioritises ecologically representative, well-connected and equitably governed systems of protected areas and other effective area-based conservation, recognising indigenous and traditional territories and practices. Currently 17% and

10% of the world's terrestrial and marine areas respectively are under protection.[11] As mentioned above, less than 1% of New Zealand's ocean territory is in Marine Protected Areas, despite the Government committing to meet the global target of protecting 30% of the ocean by 2030.[12]

Three of the United Nations 17 Sustainable Development Goals are relevant to this Strategy:

13. **Climate Action:** Make urgent efforts to combat climate change and its effects.
14. **Life Below Water:** Protect and manage the oceans, seas, and marine resources.
15. **Life on Land:** Conserve and promote the sustainable use of land-based ecosystems.[13]

These UN goals (and their wider intent), along with the Paris Agreement, are increasingly being included in New Zealand's trade agreements. For example, Article 3 of the Free Trade Agreement with the EU, signed on 9 July 2023, states that a party has an obligation to refrain from any action or omission that materially defeats the object and purpose of the Paris Agreement.

Recommendation 5: Undertake research and incorporate examples of strategies that have been successful locally and offshore

The influx of predators, the biodiversity crisis, and the changing climate are global issues that will not be solved by one country alone. There is a lack of any international – or local – analysis in this Strategy to show where similar strategies have worked, what hasn't worked, and how New Zealand can incorporate these lessons to improve in the future.

Learning from private industry leaders who manage predators, as well as international techniques, will help DOC learn from others and avoid making mistakes that have already been made. As an island nation with especially vulnerable native species, New Zealand is unique, however, there are still learnings we can take from how predators are managed elsewhere.

It is prudent to see what our trading partners are doing in this space, and these case studies should be publicly available. Good research is sorely needed, including understanding what is working (or not working) for predator control in other similar countries, especially other island nations.

We need to work together with our allies and partners to promote an effective international plan for climate change and biodiversity loss. See also why it is critical to meet New Zealand's international obligations above in **Recommendation 8: Incorporate New Zealand's international commitments.**

We recommend more detailed analysis is undertaken so this Strategy can be consistent with international standards, and we can learn about and incorporate best-practice examples and strategies from our international partners, as well as local NGOs and environmental experts.

Recommendation 6: Produce updated research on the value of New Zealand's predator free environment and our international reputation

New Zealand's clean green international brand is critical for our economic wealth, and protecting our unique native species is an important part of this. We need to understand what our environment (and our species) are worth and the actions we can take to optimise that net worth. Equally we need to know the actions we should **not** take to reduce it. In 2001, MFE prepared a report, *Valuing our Clean Green Image*. A supporting report answered the following question: *Our clean green image: What's it worth?* This is what the research found:

Dairy sector

If New Zealand's environment was perceived as being degraded, on average the consumers surveyed would purchase 54% less consumer products. The actual loss in revenue would depend on how much of the lost product could be redirected to products and markets where environmental image plays a less important role, so the potential annual loss would vary between:

- $241 million (all lost product redirected), and
- $569 million (none of the lost product redirected).

Tourism

The extent of change in purchasing behaviour (measured by change in length of stay) varied by country. Under worsened environmental perceptions, tourists in New Zealand would alter their stay by an average of, for example:

- Australia – 48% reduction
- Japan – 79% reduction
- Korea – 77% reduction.

The annual loss to New Zealand from the five markets covered in the survey of tourists would be between NZ$530 million and NZ$938 million (depending on whether lost wages and GST effects are taken into account).

Organic produce

Buyers were presented with two scenarios: New Zealand allowing (a) limited field test of GM crops for research and (b) uncontrolled releases of GM crops. In the short term New Zealand's organic sector would not be affected by allowing field tests of GM crops for research, although in the long term buyers would probably shift to other sources. Adopting a policy of uncontrolled release would see New Zealand almost certainly suffer immediate losses, with buyers either stopping or substantially decreasing purchases.[14]

Before this government implements a Predator Free Strategy for the country, it is critically important that it takes the time to ensure risks are calculated, interconnections are explored and where possible risks need to be managed. It is now 24 years since the last time New Zealand attempted to value our clean, green brand. It seems overdue to revisit and answer this important question so that decisions are made on complete information. Updating the 2001 report will allow for a value (in the form of a financial figure)to be placed on New Zealand's unique species and clean environment. This may help gain support for funding to protect these species and their habitats once the economic value of them is presented.

Recommendation 7: Include a requirement for the Strategy to become part of a central register of government department strategies (GDSs) and mandate the Strategy by law

Legislation is central to regulation. The Institute started a *GDS Index* research project in 2014 and it has been regularly updated ever since. The *Government Department Strategies Index Handbook – He Puna Rautaki* ranks each GDS in terms of essential information. It does not rate the strategy as such; it rates the strategy document's provision of essential information and clarity of communication so that readers can assess the strategic approach for themselves. Every GDS is reviewed against the Institute's Transparency Scorecard to determine how well it articulates each of six elements. Refer below for the Institute's analysis of the 2020 Predator Free strategy and the Predator Free 2050 Interim Implementation Plan. We recommend these learnings are incorporated into the 2025 Strategy.

The Institute's *GDS Index* aims to illustrate how New Zealand might strengthen GDSs to be more effective, responsive, measurable, comparable and durable through public consultation, engagement and ownership.[15] However, the 2024 *GDS Index* found only 16% of GDSs in operation (32 out of 195) are required or referred to in legislation.[16] Page 12 of the Institute's *2024 GDS Index Methodology* contains a comprehensive list of these 32 GDSs.[17]

Requiring in law that a strategy be published is a useful mechanism for Parliament to ensure strategies are developed, consulted upon and made public. In 2023, the Institute raised the issue of whether such GDSs might come under the governance of Ministry for Regulation (MFR). MFR has advised that it does not have a stewardship role for all GDSs, but has an interest, as a consumer, in specific GDSs during its reviews of where regulatory failures might exist.

It is recommended more GDSs, including this Strategy, be mandated by law to ensure a higher level of due diligence, ownership, durability and accountability. The Institute believes this ia a governance issue for the Minister for the Public Service and the Minister for Regulation.

The idea of a *GDS Index* is important because if government departments make the content of GDSs more transparent, Ministers, officials, and the wider public will be better able to assess their quality and, where appropriate, work together to deliver better outcomes more cost-effectively.

Better visibility and stewardship of GDSs would not only deliver an integrated and aligned approach to government activity but would also reduce the risk of strategies working against each other. Further, it is all too easy to initiate a strategy and then quietly let it be replaced or lost into history without lessons being learned. Hence, it is critically important to monitor active GDSs to the end of their useful life.

Furthermore, as part of improving the regulatory process in New Zealand, the Institute recommends the MFR, as a regulatory body, should be responsible for collating and measuring GDSs.

Effective strategy helps government departments solve challenging problems, which is why GDSs are such important instruments for managing the long-term interests of New Zealanders. Despite this, there is no designated government institution that regularly reviews GDS content and that the public can engage with to discuss the content of a GDS or complain about a department failing to consult with stakeholders. There is no central register that collates all GDSs on a single platform, which would enable strategies to be viewed together, allowing interested parties to identify where repetition or synergies exist or where there are strategic gaps/conflicts. There are no set criteria for how a GDS should be written and what it should include. As a result, this important policy instrument has few feedback loops, little transparency and minimal accountability

The Institute's ranking of the 'Towards a Predator Free New Zealand: Predator free 2050 strategy' in the *2024 GDS Index*

GDS02–09

Towards a Predator Free New Zealand: Predator free 2050 strategy

Purpose

'Return the voices of the insects, bats, reptiles and birds back to the forests, farmland, towns, cities and coasts.' (p.9)

Strategy (to achieve the purpose):

The approach is to eradicate mustelids, rats and possums through six interconnected pathways:

- Whānau, hapū and iwi expressing kaitiakitanga
- Communities taking action
- Supporting the kaupapa through legislation and policy
- Advancing knowledge, innovation and improvement
- Measuring and assessing the difference the department makes
- Moving from sustained predator control to eradication. (p.17)

Key data

Publication date:	February 2020
Duration:	2020–2050
Number of pages:	44
Signed by:	Crown (Minister of Conservation)
This GDS replaces:	Not applicable
Jointly held with:	Not applicable
Transferred from:	Not applicable
Strategy map:	Yes, p.19
Legislation:	Not applicable

McGuinness Institute analysis

Duration

Scope of subject matter

Climate intelligence

Transparency Scorecard

42= out of 195 GDSs

4 out of the 24 GDSs in DOC

7= out of the 57 GDSs in the Natural Resources Sector

		Score	Out of
1:	**Opportunities and Threats**		
1.1	Identifies potential opportunities	2	4
1.2	Identifies potential threats	3	4
1.3	Contains a clear statement describing the problem	6	8
2:	**Capabilities and Resources**		
2.1	Identifies current and future capabilities	3	4
2.2	Identifies capabilities it does not have but needs	2	4
2.3	Identifies current and future resources	1.5	4
2.4	Identifies resources it does not have but needs	2	4
3:	**Vision and Benefits (Purpose)**		
3.1	Provides a clear aspirational statement as to what success would look like	4	8
3.2	Identifies who the beneficiaries are	1.5	4
3.3	Describes how success will be measured	3.5	4
4:	**Approach and Focus (Strategy)**		
4.1	Breaks down the purpose into a number of strategic goals/objectives	3.5	4
4.2	Identifies a range of strategic options	2	4
4.3	Describes the chosen approach	2	4
4.4	Highlights the risks, costs and benefits	2	4
5:	**Implementation and Accountability**		
5.1	Identifies who is responsible for implementation	4	4
5.2	Identifies who will report on its progress	1.5	4
5.3	Explains how progress will be reported	1	4
5.4	Discusses whether the GDS will undergo a review	2	4
6:	**Alignment and Authority**		
6.1	Discusses predecessors to the strategy and identifies any lessons learnt	1.5	4
6.2	Aligns with its department's SOI	6	6
6.3	Aligns with its department's annual report	6	6
Total		60	96

Source: McGuinness Institute (2024).[18]

The Institute's ranking of the 'Predator Free 2050 Interim Implementation Plan 2024-2030' in the *2024 GDS Index*

GDS02-22

Predator Free 2050 Interim Implementation Plan 2024–2030

Purpose

'To establish a common programme of work for the main organisations responsible for implementing a predator free Aotearoa New Zealand.' (p.3)

Strategy (to achieve the purpose):

The approach is to focus on five main goals:

- Have the tools and techniques to feasibly eradicate predators in diverse landscapes
- Have a clear and well-researched plan to achieve the Predator Free 2050 goal
- Have an authentic Treaty partnership
- Have the support of New Zealanders
- Attract the investment needed to achieve Predator Free 2050. (p.9)

Key data

Publication date:	July 2024
Duration:	2024–2030
Number of pages:	25
Signed by:	Not signed
This GDS replaces:	Not applicable
Jointly held with:	Not applicable
Transferred from:	Not applicable
Strategy map:	Yes, p.10
Legislation:	Not applicable

McGuinness Institute analysis

Duration

Scope of subject matter

Climate intelligence

Transparency Scorecard

94= out of 195 GDSs

10= out of the 24 GDSs in DOC

23= out of the 57 GDSs in the Natural Resources Sector

		Score	Out of
1.	**Opportunities and Threats**		
1.1	Identifies potential opportunities	4	4
1.2	Identifies potential threats	0	4
1.3	Contains a clear statement describing the problem	4	8
2.	**Capabilities and Resources**		
2.1	Identifies current and future capabilities	2	4
2.2	Identifies capabilities it does not have but needs	3	4
2.3	Identifies current and future resources	3	4
2.4	Identifies resources it does not have but needs	3	4
3.	**Vision and Benefits (Purpose)**		
3.1	Provides a clear aspirational statement as to what success would look like	2	8
3.2	Identifies who the beneficiaries are	4	4
3.3	Describes how success will be measured	2	4
4.	**Approach and Focus (Strategy)**		
4.1	Breaks down the purpose into a number of strategic goals/objectives	4	4
4.2	Identifies a range of strategic options	0	4
4.3	Describes the chosen approach	0	4
4.4	Highlights the risks, costs and benefits	0	4
5.	**Implementation and Accountability**		
5.1	Identifies who is responsible for implementation	2	4
5.2	Identifies who will report on its progress	4	4
5.3	Explains how progress will be reported	0	4
5.4	Discusses whether the GDS will undergo a review	2	4
6.	**Alignment and Authority**		
6.1	Discusses predecessors to the strategy and identifies any lessons learnt	2	4
6.2	Aligns with its department's SOI	0	6
6.3	Aligns with its department's annual report	6	6
Total		47	96

Source: McGuinness Institute (2024).[19]

4.0 Conclusion

A significant amount of policy work, consultation, scientific research, economic analysis, and community and environmental analysis is required before this Strategy achieves any of the promised benefits for New Zealand. This Strategy needs to consider the ecosystem as a whole and look at long-term opportunities, especially developments in technology and AI.

The Ministry for the Environment's 2025 edition of New Zealand's report on the state of our environment, *Our Environment* 2025, paints a picture of the seriousness of the issues we are facing:

> "New Zealand's unique biodiversity has a high proportion of threatened or at-risk species – one of the highest amid the global biodiversity crisis", the report said, noting that land use, pollution, invasive species and climate change can all have an impact on biodiversity.
> The report also found the most widespread water quality issue affecting groundwaters was the presence of E coli – a bacteria found in the guts of animals and humans that can cause serious illness and has been linked to farming and cities in New Zealand.
> Of more than 1,000 groundwater monitoring sites, nearly half failed to meet the drinking water standard for E coli on at least one occasion between 2019 and 2024, while nearly half of the monitored rivers shows worsening E coli trends.
> Meanwhile, a significant proportion of groundwaters have accumulated excess nitrate due to activities such as intensive farming, logging and urbanisation, which also affects water quality and degrades surface water ecosystems.[20]

New Zealand has a unique opportunity that many countries do not have: we are proud of our unique environment, precious flora and fauna, geographic isolation, strong connection with the land and ocean, and Treaty obligations – and we have high-quality exports that profit from our clean, premium sustainable brand. The Institute, and many others, have undertaken a significant amount of work to ensure New Zealand's public policy safeguards the environment for future generations.

The Strategy does not reflect the complexities of protecting species and eliminating predators in a way that empowers a country with our unique values and characteristics. We note the Strategy acknowledges the importance of getting our Predator Free Strategy right, and the risks if we get it wrong:

> Nature is central to New Zealand – it's part of our national identity and supports our economy, wellbeing and way of life. It supports productive primary industries, brings jobs to our communities, draws visitors from around the world and boosts local economies. As New Zealanders, our connection to this land and nature runs deep. If we don't look after nature, we risk losing the New Zealand way of life.[21]

We want to be responsible stewards for the next generation. This Strategy is confusing when read with other consultation documents, and it does not allow for the long-term planning required in order to protect our environment for future generations.

Endnotes

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