



**Forest & Bird**

TE REO O TE TAIAO | *Giving Nature a Voice*

**RESPONSE TO CONSULTATION 'ACTION FOR NATURE: IMPLEMENTING NEW  
ZEALAND'S BIODIVERSITY STRATEGY 2025-2030' FROM THE ROYAL FOREST & BIRD  
PROTECTION SOCIETY OF NEW ZEALAND INCORPORATED**

**To** Department of Conservation Te Papa Atawhai

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## Introduction

1. The Royal Forest and Bird Protection Society Incorporated (Forest & Bird) has been Aotearoa New Zealand's independent voice for nature since 1923. Forest & Bird's constitutional purpose is:

To take all reasonable steps within the power of the Society for the preservation and protection of the indigenous flora and fauna and the natural features of New Zealand.

2. Forest & Bird has over 100,000 members and supporters who are passionate about protecting and restoring nature on conservation land across the motu. Many of our projects are located on Department of Conservation (DOC) land, and we often collaborate with DOC to achieve the objectives of both organisations.

## Forest & Birds general comments

3. Aotearoa New Zealand is a biodiversity hotspot. Plants and animals here evolved in isolation for millions of years, creating an astonishing number and diversity of endemic species including flightless birds and giant snails, found nowhere else on earth.
4. The added pressures from climate change and increased climate hazard risk will have adverse effects on many of our natural features and indigenous species<sup>1</sup>. The way in which people, specifically decision-makers, value nature will have a considerable influence on the health and wellbeing of both human systems and the natural world.
5. Forest & Bird welcomes the conservation initiatives outlined in the 13 actions. However, we are concerned with the higher priority given to terrestrial ecosystems, which can lead to the underappreciation and neglect of coastal/marine and freshwater environments. These areas are equally vital, supporting diverse wildlife and playing crucial roles in climate regulation, coastal protection, and the livelihoods of communities. By expanding our focus to include

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<sup>1</sup> <https://www.doc.govt.nz/news/media-releases/2025-media-releases/100s-of-nz-species-highly-vulnerable-to-climate-change/>

these habitats and aquatic biodiversity, we can promote a more comprehensive approach to environmental preservation that ensures the health and resilience of all ecosystems.

6. In their 2023 article, Leathwick and Byrom highlight that we focus heavily on managing predators while largely neglecting wild ungulates<sup>2</sup>. These ungulate populations are growing, and they harm many native species and ecosystems. This imbalance in management seems influenced more by socio-political pressure than by scientific needs. As a result, we are unlikely to meet Aotearoa's biodiversity goals unless we adopt a more systematic approach that addresses all biodiversity threats. We see these problems as part of ongoing issues with how Aotearoa manages biodiversity. To improve this situation, we need to secure stable funding, clarify goals and responsibilities, enhance leadership, improve planning and prioritisation of actions, and better coordinate efforts among different conservation groups.
7. This emphasises the need for strong cross-sector governance and leadership, adequate funding, and coordinated pest control management to address gaps in achieving national biodiversity goals. In our submission on PF2050, Forest & Bird highlighted concerns about governance, resources, and agency coordination. A comprehensive programme for uncontrolled wild ungulates, similar to PF2050, is crucial for addressing New Zealand's challenges and meeting the Te Mana o te Taiao objectives. Forest & Bird also notes that the discussion document lacks clarity on how the issues identified by Leathwick and Bryom will be resolved.
8. Forest & Bird agrees that implementing Te Mana o te Taiao, along with the ANZBS, requires a collective effort. However, we are concerned that there seems to be a disconnect between the implementation plan and the time-bound objectives and goals of Te Mana o te Taiao. We find it surprising that the discussion document lacks an analysis or summary regarding the extent to which the 2025 goals have been achieved. This information would be a crucial foundation for determining actions in the upcoming implementation plan. Understanding what has worked and what has not from the previous five-year implementation plan is vital for setting the trajectory for the upcoming plan, aiming to achieve Te Mana o te Taiao's publicly agreed time-bound goals. Furthermore, the connection between the four themes,

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<sup>2</sup> Leathwick, J.R. and Byrom, A.E. (2023). *The rise and rise of predator control: a panacea or a distraction from conservation goals*. NZJE (2023) 47(1).

the 13 actions, and the objectives and goals of Te Mana o te Taiao appears to be rather vague.

## **Forest & Birds response to consultation themes**

### **Theme 1: Agreed biodiversity priorities are driving investment and action**

*We want to identify and agree on priority species and habitats. This is so we can focus our efforts and determine how best to work together to protect and restore them, regionally and nationally.*

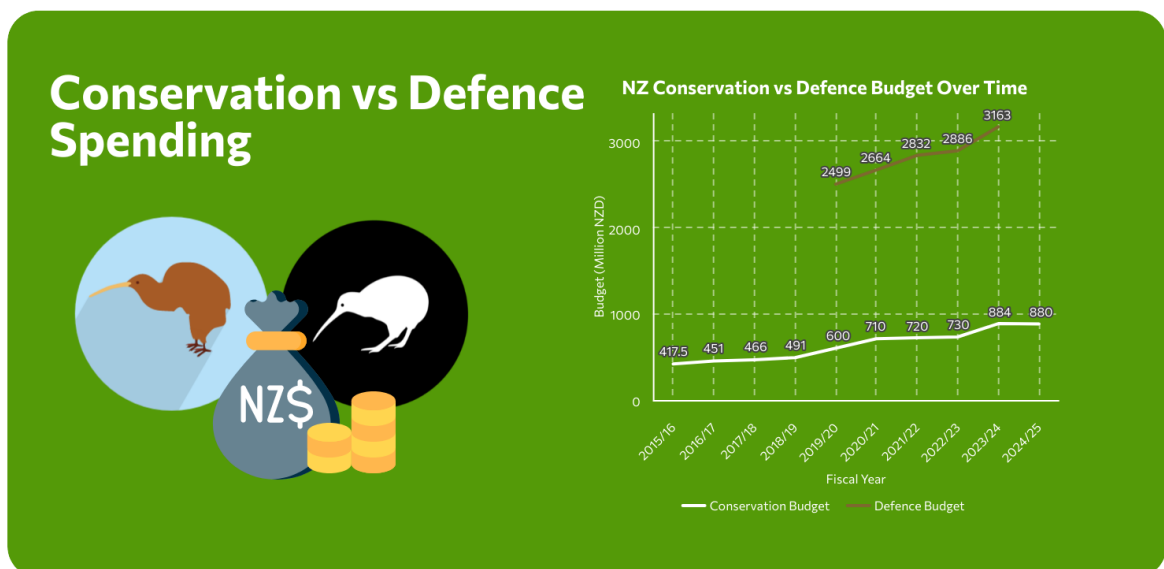
9. Forest & Bird notes that this approach evokes the concept of conservation triage. For nearly two decades, the Department of Conservation has been delving into a model known as the Project Prioritisation Protocol (PPP). In the crucial task of funding the recovery of species on the brink of extinction, conservation triage offers a systematic and objective framework to evaluate the costs, benefits, and probabilities of success for various conservation efforts.
10. Yet, we must approach conservation triage with caution. This method often prioritises charismatic and well-known species for limited resources, potentially sidelining lesser-known species that may possess even greater ecological significance. The phrase “*agreed biodiversity priorities driving investment and action*” rings hollow and resembles bureaucratic jargon. The pursuit of saving threatened species should never be reduced to a mere financial transaction.
11. When the PPP is adopted, the evaluation of species often hinges on the cost of saving them rather than their intrinsic ecological value. By assigning financial costs to species, we inadvertently diminish the number of those eligible for recovery funding. The longer a species hovers on the edge of extinction, the steeper its cost for recovery. For example, two of our beloved native birds, the takahē and kākāpō, both require a significant share of the overall recovery investment yet embody the very essence of our conservation challenges. We need to ensure that our efforts recognise and protect the full spectrum of biodiversity – in terrestrial, freshwater and marine ecosystems.
12. Similarly, true collaboration with stakeholders goes beyond mere financial considerations; it is fundamental to the success of effective conservation efforts. By actively involving a diverse

group of stakeholders—including local communities, government agencies, non-profit organisations, and businesses—we create an environment for open dialogue. This inclusive approach not only fosters understanding and trust among different parties but also encourages the sharing of insights and perspectives. As a result, we can uncover a wider array of innovative solutions that address environmental challenges, ensuring that all voices are heard and that the strategies developed are more comprehensive and sustainable.

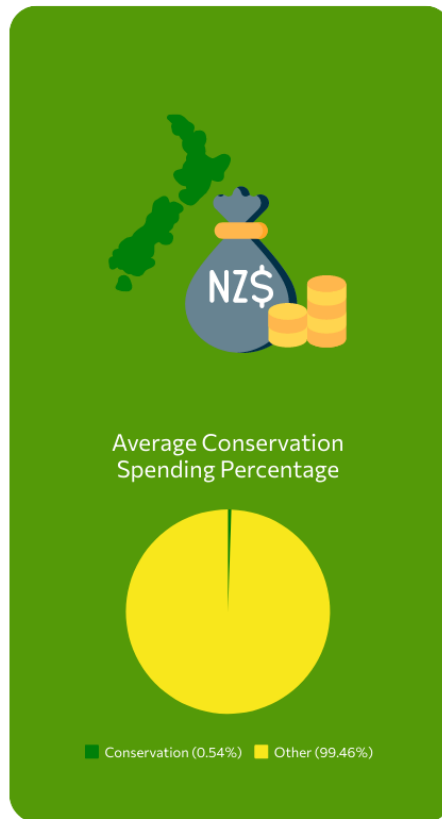
## Theme 2: Increased external funding, revenue and support is delivering more work on biodiversity priorities

*We want to attract investors and generate revenue for nature, and we want to make it easier for people to access government support.*

13. The term "triage" is often employed in contexts where the Department of Conservation must make difficult decisions due to limited financial resources. Factors contributing to the funding shortfall include rising operational costs and growing environmental challenges that demand more resources than ever before. As a result, conservation spending represents only a small fraction of overall government expenditure, highlighting the urgent need for a re-evaluation of priorities in resource allocation to ensure that critical conservation efforts receive the support they need to succeed. The prioritisation of governmental portfolios other than conservation is demonstrated in the figure below, using expenditure on the NZ Defence Force as an example.



The discrepancy of governmental spending in Aotearoa on conservation vs defence. Source: Forest & Bird



Average governmental spending in Aotearoa on conservation. Source: Forest & Bird

14. We want to raise that the notion of generating revenue from natural resources prompts important ethical considerations. It is imperative to recognise that the preservation of biodiversity is not merely an economic opportunity but a fundamental national responsibility. Protecting our ecosystems and the diverse species they encompass should be prioritised, as these biological assets contribute to our environmental health, cultural identity, and overall well-being. Treating biodiversity solely as a means for profit risks undermining the ecological balance and jeopardising the very resources upon which society depends. Thus, our approach to nature should emphasise sustainable stewardship that values and safeguards our unique biodiversity for future generations.
15. Recent media reports indicate a notable shift in the coalition government's commitment to funding conservation initiatives<sup>34</sup>. Key modifications in biodiversity funding include:

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<sup>3</sup> <https://newsroom.co.nz/2024/06/04/environmental-legal-aid-fund-killed-in-budget-cuts/>

<sup>4</sup> <https://www.reuters.com/world/asia-pacific/new-zealand-scraps-clean-green-policies-boost-economy-2024-08-04/>

- **Expansion of Public-Private Partnerships:** The government is actively encouraging businesses and philanthropists to participate in funding ecological projects, thereby fostering a collaborative model for conservation efforts.
- **Reallocation of DOC's Budget:** There has been a reallocation of resources from government-driven programmes towards more localised and privately funded conservation efforts, often without adequate scrutiny and oversight (for example, conservation funding diverted toward protecting browsing pests<sup>5</sup>).
- **Controversy Surrounding Funding Reductions:** Conservation organisations have raised significant concerns regarding potential reductions in funding for essential biodiversity programmes managed by DOC.

### **Theme 3: An evidence and knowledge-based approach is driving improvements in practice and decision making for biodiversity**

*We want to improve the data, knowledge, and lessons from successful partnerships to drive good decision making and measure the difference we make for nature.*

16. Forest & Bird supports the rights and interests of Māori and iwi, as well as the implementation of Te Tiriti. Māori have a rich history of living with and valuing nature in Aotearoa. They possess a significant body of knowledge about natural systems and the species that inhabit them, which is essential for understanding the cultural, social, environmental, and economic value of nature. This knowledge can also create opportunities to better integrate these values into decision-making processes. It is crucial that Te Tiriti and Te Ao Māori are fully integrated into the design of all government decision-making systems.<sup>6</sup>
17. We commend the efforts to draw upon lessons from successful partnership-based delivery models, such as Jobs for Nature, which successfully harnessed collaboration between various stakeholders to promote environmental conservation. Unfortunately, with the recent disbandment of this initiative, the government has disposed of a crucial opportunity to

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<sup>5</sup> <https://www.doc.govt.nz/globalassets/documents/about-doc/oia/2025/25-b-0097-briefing-sika-hosi-proposal.pdf>

<sup>6</sup> [https://www.sustainableseaschallenge.co.nz/assets/dms/IFI/Empowering-Maori-knowledge/Empowering-Maori-Knowledge\\_Guidance.pdf](https://www.sustainableseaschallenge.co.nz/assets/dms/IFI/Empowering-Maori-knowledge/Empowering-Maori-Knowledge_Guidance.pdf)

engage and recruit the skilled conservation workforce essential for tackling the ongoing biodiversity crisis. Without the involvement of conservation specialists, our efforts to combat the decline of biodiversity are significantly diminished, putting our natural resources at greater risk.

18. Considering the interconnected biodiversity and climate crises, investment in the implementation and maintenance of nature-based solutions, including comprehensive browser pest control as one of those tools, should be prioritised in decision-making frameworks<sup>7</sup>.
19. Nature-based solutions are defined in New Zealand's National Adaptation Plan<sup>8</sup> as "Solutions that are inspired and supported by nature and are cost effective, and at the same time provide environmental, social, and economic benefits and help build resilience. Such solutions bring more, and more diverse, nature and natural features (e.g., vegetation and water features) and processes into cities, landscapes, and seascapes, through locally adapted, resource-efficient, and systemic interventions."
20. While it is important to integrate more healthy green spaces/nature-based solutions throughout our landscape, it is also crucial that we protect and enhance those *already* present (e.g., existing forests, wetlands, and river corridors) to ensure their ability to help mitigate climate impacts is not weakened further.
21. Despite a plethora of successful international examples and the promising frameworks established in New Zealand's national direction—such as the Emissions Reduction Plan, National Adaptation Plan, and New Zealand Coastal Policy Statement—our country has yet to fully harness the transformative potential of nature-based solutions. This missed opportunity profoundly affects our economic, social, cultural, and environmental outcomes, and it stems from several key challenges:

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<sup>7</sup> [https://www.forestandbird.org.nz/sites/default/files/2025-06/F%26B\\_NBS\\_Resource\\_Online.pdf](https://www.forestandbird.org.nz/sites/default/files/2025-06/F%26B_NBS_Resource_Online.pdf)

<sup>8</sup> <https://environment.govt.nz/what-government-is-doing/areas-of-work/climate-change/adapting-to-climate-change/national-adaptation-plan/>



- **Underappreciation of Nature's Value:** Decision-makers often fail to recognise and adequately value the life-supporting functions that nature provides.
- **Inaccessible Cost-Benefit Data:** We lack comprehensive and accessible cost-benefit data for nature-based solutions within the Aotearoa New Zealand context. Such data must encompass not just the economic aspects of a project, but also its social, environmental, and cultural ramifications. Unfortunately, public information regarding the broader value of nature—including ecosystem services—tends to be elusive, especially when excluding recreational or extractive valuations.
- **The Prevalence of Private Interests:** The priorities of private interests frequently overshadow the critical need for environmental well-being and the stewardship of our shared resources.
- **Priorities in Resource Management:** Our resource management framework often emphasises short-term economic benefits at the expense of long-term environmental sustainability, sidelining crucial ecological considerations.
- **Short-Sighted Economic Practices:** The prevailing economic paradigm tends to prioritise the extractive value of nature—through industries such as mining, forestry, fishing, and gas drilling—without regard for the intrinsic or potential value of our natural ecosystems. This approach has detrimental impacts, leading to habitat destruction, freshwater pollution, and an acceleration of climate change. The consequences extend beyond immediate environmental degradation; they undermine nature's capacity to adapt and mitigate the long-term impacts of climate change.
- **Biased Decision-Making Frameworks:** Our current funding models and decision-making processes are often entrenched in conventional business practices. For instance, hard-engineered infrastructure is routinely favoured over innovative nature-based solutions that can deliver extensive co-benefits.

22. By addressing these challenges and embracing the power of nature-based solutions, New Zealand can pave the way toward a more sustainable and resilient future, unlocking the immense potential that our rich natural heritage has to offer.

#### **Theme 4: Increased capability and support enables New Zealand to address the state of our biodiversity**

*What this means: We want to develop the right skills and encourage people to work together to look after nature, including in the biosecurity space.*

23. Knowledgeable and skilled individuals are essential for addressing complex ecological challenges and the persistent capability gaps we are experiencing are a direct consequence of the government's failure to prioritise our environment. This neglect has manifested in significant funding cuts to universities and public sector agencies that are crucial for research and policy development. As a result, we have seen a troubling wave of job losses among subject matter experts. These cuts not only undermine our ability to effectively respond to the twin crisis we're experiencing but also hinder innovation and the development of sustainable solutions for the future. Addressing these gaps is essential for safeguarding our environment and ensuring a resilient economy.
24. The Jobs for Nature programme engaged and trained individuals who may not have previously considered a career in conservation, or who lacked the opportunity due to their absence of specialised knowledge and experience. The loss of Jobs for Nature means we are losing these trained individuals and not bringing in new talent to fill gaps in the conservation field that are desperately needed. Many participants in the Jobs for Nature programme had not previously thought about pursuing a career in conservation. However, through their involvement, they gained valuable skills, insights, and a deep appreciation for environmental stewardship. Upon completing the programme, they returned to their communities equipped not only with newfound knowledge but also with a passion for conservation. This enthusiasm has enabled them to engage others in their communities, fostering greater awareness and inspiring action to protect local natural resources and ecosystems.
25. Further it is imperative to note that the wider New Zealand public may suffer from a shifting baseline syndrome - a societal phenomenon of forgetting past natural abundance and becoming increasingly unaware of the gradual deterioration of our environment. This condition leads to a distorted perception of what constitutes a healthy ecosystem. For instance, individuals might not recognise the stark differences between vibrant, thriving forests and those that are unhealthy, degraded, or suffering from factors such as damage by

browsing pests. As a result, people may accept diminished ecological conditions as the norm, failing to grasp the extent of environmental damage and the pressing need for conservation efforts. This lack of awareness can hinder efforts to restore and protect natural habitats, as individuals may not fully understand the critical importance of maintaining biodiversity and ecosystem health.

26. In line with this, achieving social license on a national scale is crucial for the successful implementation of programmes such as PF2050, and we feel this aspect has not been adequately addressed. While we acknowledge that developing public support takes time and careful consideration, the current strategy has a strong focus on engagement with those who are already supportive of the initiative, which limits the potential for broader public acceptance. This can be achieved through transparent communication, community engagement activities, and educational outreach, ensuring that the public feels included in the decision-making process. However, with the recent disestablishment of Predator Free 2050 Ltd and overall cuts in funding, we are concerned about the ability of nationally led predator control projects to maintain the progress made over the past five years as well as achieving the targets set for the future.
27. While increasing awareness is a stated goal, a significant body of research, including studies pertinent to Aotearoa, indicates an "awareness-action gap"<sup>9</sup>. A core contributor to this disparity is the "extinction of experience" – a growing disconnection of people from the natural world due to modern lifestyles.
28. Engaging all New Zealanders is essential to tackling the significant biodiversity crisis we are facing. It is crucial to prioritise and offer accessible, meaningful opportunities for people to connect with nature firsthand. This engagement is vital for fostering emotional connections and a sense of belonging to our environment.
29. Forest & Bird recommends to strategically collaborate with and provide resources for community hubs. Funding and support should empower these groups to intentionally design and implement programmes that focus on building connections to nature, promoting ecological literacy, and creating pathways for local action as primary objectives, rather than

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<sup>9</sup> Hughey, K.F.D., Kerr, G.N., & Cullen, R. (2019). *Public Perceptions of New Zealand's Environment: 2019*. Christchurch: Lincoln University.

secondary benefits. This approach aligns with the proven success of community-based conservation in enhancing engagement and fostering a sense of local ownership.

- End of Submission -