

# ACTION FOR NATURE

Implementing New Zealand's Biodiversity Strategy  
2025–2030

Summary of submissions



Cover: Rakiura Track, Lee Bay to Port William/Potirepo.

Photo: Keri Moyle, [signsoflife.co.nz](http://signsoflife.co.nz)

**Action for nature – Implementing New Zealand’s  
Biodiversity Strategy: summary of submissions**

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# Acknowledgements

The Department of Conservation is grateful to everyone who joined the discussions and meetings, raised questions, and provided feedback.

The submissions and engagement have been constructive and valuable, with contributors bringing many different perspectives, including from tangata whenua and commercial, recreation, conservation, local government and statutory organisations.



Kākāriki / yellow-crowned parakeet on Anchor Island. *Photo: Leon Everett*

# Introduction

## Purpose and scope of this document

This document presents a summary of the submissions received on [Action for nature – Implementing New Zealand’s Biodiversity Strategy 2025–2030](#), published in May 2025 (the discussion document).

The discussion document sought feedback on 13 proposed critical actions for the next implementation plan for [Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy 2020](#) (the Biodiversity Strategy). These are actions that central and local government could take to make a difference for nature and empower all New Zealanders to take action.

This document and insights from submitters were considered as part of developing [Action for nature](#) – the Biodiversity Strategy implementation plan for 2025–2030.

## Consultation process

Before public consultation, the Department of Conservation (DOC) led targeted engagement with iwi, hapū and Māori organisations from June to December 2024. Comprehensive feedback was received from 12 iwi/hapū/post-settlement governance entities and 3 Māori rūpū (groups) across Aotearoa New Zealand. DOC analysed the feedback and reflected it in advice sent to the Minister of Conservation as part of the process to approve release of the discussion document.

The discussion document was published on 5 May 2025, and consultation was conducted jointly with the Predator Free 2050 Strategy review. The consultation period was 8 weeks from 5 May to 30 June 2025.

The engagement approach identified four key groups: tangata whenua (iwi, hapū and Māori organisations), primary key stakeholders, secondary key stakeholders and the public. Targeted engagement was carried out with tangata whenua and primary key stakeholders, and online resources were made available for secondary stakeholders and the wider public.

The discussion document was made publicly available on DOC’s website. Information about the consultation was shared directly with tangata whenua and primary stakeholders, and DOC officials were available to meet with these groups upon request. Six groups, including tangata whenua, conservation boards and the New Zealand International Union for Conservation of Nature (NZ IUCN) Committee, took up the offer to meet.

DOC hosted two 1-hour public webinars on 20 and 26 May 2025, respectively, on both the Biodiversity Strategy implementation plan and the Predator Free Strategy review, with a total of 211 attendees.

# Submissions overview

## Who submitted

A total of 197 submissions were received, and DOC also held six meetings with iwi, hapū and stakeholders by request (Table 1).

**Table 1: Number of submissions by submitter group**

Submitter group	Number of submissions
Individuals	91
Community groups & NGOs	35
Local government & statutory bodies	25
Iwi, hapū & Māori organisations	16
Business & tourism/recreation sector	11
Expert & science organisations	10
Primary sector	8
Other	1
<b>Total</b>	<b>197</b>

Abbreviation: NGO, non-governmental organisation

## How submissions were received

The discussion document asked three main sets of questions:

1. What do you think of the four themes we are proposing to focus on and use as a way of framing the actions?
2. For each of the 13 critical actions: What do you think of this action? Is there anything you would add or change?
3. Overall, are these actions the ones we should focus on to drive the protection, restoration and sustainable use of biodiversity in New Zealand between now and 2030? What do you think of the proposals as a package?

Submissions were collected through an online form and free-form written statements: 110 submissions were completed using the online form and 87 submissions were written statements. The online form included the questions shown on page 45 of the discussion document. These were posed as Likert scale questions (strongly support, support, neutral, oppose, strongly oppose and unsure), with a free text box for each.

Note that the 'strongly oppose' option was initially mistakenly displayed as a second 'strongly support' option for critical action 3 on the online form. This error was corrected on 6 June, and submitters could still express their strong opposition to this action in the free text box to ensure their feedback was considered.

# Summary of feedback

## Key topics raised by tangata whenua

Fifteen submitters identified themselves as iwi, hapū, Māori organisations or Moriori (imi).

These submitters highlighted the need for co-development of biodiversity priorities, sustained investment in relationships, and support for Māori-led initiatives as part of broader cultural and community wellbeing. Mātauranga Māori (traditional knowledge) and Western science were seen as complementary knowledge systems of equal mana (authority), with Māori data sovereignty identified as being essential for ethical collaboration. Concerns were also raised about the risks of market-based biodiversity finance models, with calls for Māori-led governance and safeguards to uphold mana whenua (territorial authority) interests. Alignment with wider legislative reforms and the protection of Māori cultural and intellectual property rights were also noted as being critical.

There was general support for the critical actions but concern about the lack of Treaty partnership reflected in their development and implementation. It was also felt that the critical actions would not go far enough to halt biodiversity loss or support restoration. There was a call for more ambitious and legally supported measures to protect biodiversity, with rangatiratanga (the right to exercise authority) recognised as central to achieving biodiversity outcomes.

This feedback was similar to that collected during targeted engagement prior to public consultation, which has been built into the summary for each critical action.

## Feedback on the proposed themes

In total, 32 submitters provided feedback on the four themes sitting above the critical actions, of whom 29 indicated their level of support (Table 2).

**Table 2: Level of support for the overarching themes by submitter type**

Submitter type	Supports	Does not support
Individuals	2	1
Community groups & NGOs	6	2
Local government & statutory bodies	8	0
Iwi, hapū & Māori organisations	0	4
Business & tourism/recreation sector	2	0
Expert & science organisations	1	0
Primary sector	2	1
<b>Total number of submissions</b>	<b>21</b>	<b>8</b>

### Most submitters supported the themes

Comments included that the themes provide a good framework for the critical actions and that the structure is well aligned with national and international biodiversity goals/targets.

### Some felt the themes missed important aspects

Some submitters questioned how focusing on these themes would serve the needs of community groups and noted the absence of empowering action to address the key drivers of biodiversity loss. Others noted a lack of focus on Treaty partnership and consideration of [Wai 262](#). A few submitters found it hard to understand the relationship between the themes and the Biodiversity Strategy.

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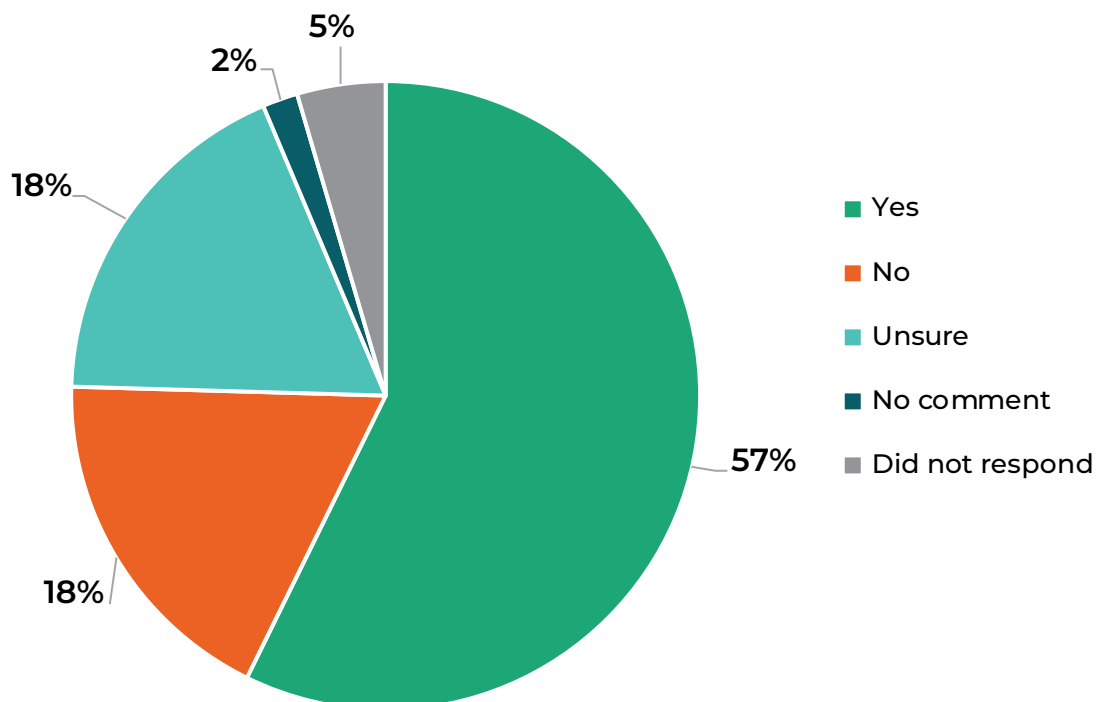
The proposed four themes framework fundamentally fails to address the systemic issues that have prevented meaningful conservation outcomes for tangata whenua.

*Te Tira Whakamātaki*

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## Feedback on the critical actions

Submitters who completed the online form were asked if they considered the collection of critical actions to be the actions the Government should focus on for protection, restoration and sustainable use of biodiversity in New Zealand through to 2030. More than half of the 110 online form submissions indicated that they are the right actions to focus on (Figure 1).



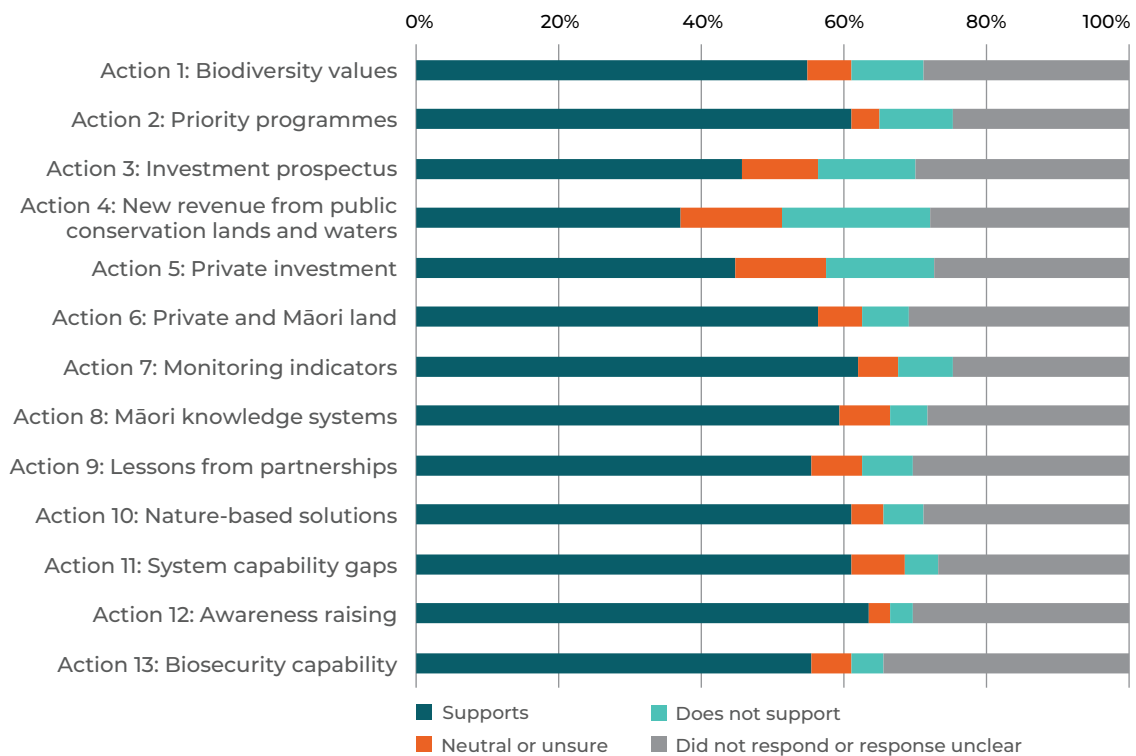
**Figure 1: Submitters' views on the collection of critical actions being the right actions for the Government to focus on (online form responses only; 110 submissions)**

When the feedback from all submitters who indicated a level of support for the critical actions as a collection is considered by submitter type, across both the online form and email submissions, it can be seen that the level of support was similar across all groups except iwi, hapū and Māori organisations (Table 3).

**Table 3: Level of support for the collection of critical actions by submitter type (online form and email responses; 159 submissions)**

Submitter type	Supports	Neutral/ unsure	Does not support	Total
Individuals	49	18	21	88
Community groups & NGOs	14	3	6	23
Local government & statutory bodies	14	1	2	17
Iwi, hapū & Māori organisations	6	1	8	15
Business & tourism/recreation sector	5	0	0	5
Expert & science organisations	5	0	1	6
Primary sector	3	1	1	5
<b>Total number of submissions</b>	<b>96</b>	<b>24</b>	<b>39</b>	<b>159</b>

Looking at the overall level of support for each of the 13 critical actions individually from all submitters, it can be seen that the majority of submitters were supportive across most of the actions (Figure 2). There was particularly strong support for actions relating to biodiversity values, biosecurity capability and raising awareness. The least supported actions were concerned with seeking private sector funding.



**Figure 2: Level of support for each of the 13 critical actions (197 submissions)**

## Key insights

### **Success will depend on how the critical actions are implemented**

Submitters highlighted the importance of integrating the critical actions with regional priorities, providing sufficient investment, ensuring adaptability to emerging challenges, balancing large-scale initiatives with localised efforts, and engaging with iwi, hapū, communities, private landowners and industry groups to shape and drive implementation on the ground. They also wanted the actions to address the drivers of biodiversity loss (and specifically the climate crisis) and to support community-led efforts and Moriori (imi) perspectives. Some felt that the actions were too species focused. There was also feedback that marine, coastal and freshwater ecosystems need to have a greater presence in the actions and implementation plan.

### **Ambitious action is needed now to address the biodiversity crisis**

While people supported the critical actions, they wanted them to go further. The collection of actions was considered weak and lacking in detail by a large number of submitters. There was a call for more specificity and for actions that will meet New Zealand's commitment under the Kunming-Montreal Global Biodiversity Framework (GBF).

### **There is concern about the role of private finance in biodiversity protection**

Submitters cautioned against economic interests having undue influence and questioned how this funding will support activities led by iwi, hapū and community groups. They considered that safeguards are needed to ensure that revenue is generated in a manner that has no adverse effects on biodiversity.

### **There needs to be clearer alignment with the Biodiversity Strategy**

There was concern that some strategy objectives lack corresponding critical actions. Some submitters viewed that the critical actions have moved too far away from delivering the goals and objectives of the Biodiversity Strategy, which could compromise its effectiveness.

### **Greater clarity is needed on progress made to date towards implementing the Biodiversity Strategy**

Submitters questioned whether there had been suitable analysis of progress made to date during the development of the critical actions. There were calls for a stocktake of what had been achieved towards delivering the goals and objectives of the Biodiversity Strategy between 2020 and 2025.

The following sections outline feedback on each of the critical actions that sit beneath the four themes, grouped by submitter type.

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

## Critical action 1

Develop a national picture of our most important biodiversity values and quantify the costs to protect and restore priority species and habitats.

### Early engagement feedback

Feedback received during early engagement emphasised the importance of this action in guiding conservation efforts and ensuring that resources are directed to priority areas. Participants called for clear criteria that reflect not only endangered species but also local and culturally significant biodiversity, with Māori involvement being seen as essential due to their deep knowledge and connection as kaitiaki (guardians).

### Overview of public submissions

In total, 167 submitters provided feedback on critical action 1, of whom 140 indicated their level of support (Table 4).

**Table 4: Level of support for critical action 1 by submitter type**

Submitter type	Supports	Neutral/ unsure	Does not support
Individuals	57	11	14
Community groups & NGOs	16	1	3
Local government & statutory bodies	17	0	0
Iwi, hapū & Māori organisations	3	0	1
Business & tourism/recreation sector	6	0	0
Expert & science organisations	5	0	1
Primary sector	3	0	1
Other	1	0	0
<b>Total number of submissions</b>	<b>108</b>	<b>12</b>	<b>20</b>

## Key insights

### Collaborative and inclusive prioritisation is essential

The development of a national picture with credible, shared biodiversity information was seen by many as essential for prioritising limited resources efficiently across biodiversity issues.

There was strong support for genuine Treaty-based partnerships with iwi and hapū, integration of mātauranga Māori, and processes that ensure local communities help shape biodiversity priorities across all land tenures.

Several submissions proposed participatory mapping and community-led, iwi-supported data collection aligned with central frameworks. Submitters also called for recognising taonga (treasured) species and habitats as defined by iwi and hapū and embedding mātauranga Māori from the outset.

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I recommend reframing the action to ensure it reflects the diversity of knowledge systems and governance responsibilities across Aotearoa. A “national picture” must not impose a single, centralised view. Instead, it should be co-developed as a mosaic of regional, cultural, and relational priorities, including those defined by mana whenua. Mātauranga Māori offers frameworks of value that are whakapapa-based, spiritually informed, and often not captured in conventional ecological data. These must be embedded from the outset, not added retrospectively.

*Individual submitter*

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### Criteria must be transparent and inclusive

Submitters called for transparent, well-defined criteria for identifying important biodiversity, with suggestions including the ecological value, threat status, spiritual and cultural significance, and contribution to ecosystem services. While some supported cost transparency, others cautioned against reducing biodiversity to monetary terms. Submitters emphasised the need for an ecosystem-wide approach that includes marine, freshwater, urban and privately owned environments, and expressed concern that prioritisation could marginalise less charismatic but ecologically valuable species.

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Currently, a small number of charismatic species are receiving most of the funding, leaving behind some that might be less loveable but ecologically highly valuable, such as corals, freshwater fish, invertebrates and lizards. Make sure that all species are considered equally. Currently, funding is tunnel visioned and focused on a few species rather than entire ecosystems, habitats and how they interact and interconnect. Make sure that there is more focus on ecosystem conservation.

*Individual submitter*

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### **Capacity is needed to improve datasets and consider trade-offs**

Submitters supported the development of consistent and spatially explicit data (for example, GIS-based mapping) to inform planning and consent decisions. Concerns were raised about reconciling datasets, agency capacity and the political will to act. Several questioned the need for a new assessment, preferring immediate investment in conservation delivery.

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Instead of spending taxpayers' money on research of questionable value, direct funding to direct conservation action, e.g. poisoning, trapping, weed control, predator-proof fences, and indigenous plantings.

*Minerals West Coast*

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### **Climate and biodiversity co-benefits are an advantage**

Several submitters identified this action as a platform for scaling up nature-based solutions that address both biodiversity and climate change obligations.

## **Critical action 2**

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Tackle biodiversity loss by agreeing on priority programmes to:

- a. protect and restore high-priority degraded habitats (e.g. impacts from browsers, weeds, predators)
- b. recover native species
- c. develop nature-based solutions for biodiversity and climate change (e.g. wetland restoration), in light of environmental and climate-change responsibilities.

### **Early engagement feedback**

Feedback received during early engagement emphasised the importance of establishing priority programmes to address biodiversity loss and risk, with mechanisms for regular review and adaptation. Participants also stressed the need for transparency in how priorities are determined and called for whānau, hapū and iwi to be actively involved in co-developing these lists and programmes for critical actions 1 and 2.

## Overview of public submissions

In total, 169 submitters provided feedback on critical action 2, of whom 148 indicated their level of support (Table 5).

**Table 5: Level of support for critical action 2 by submitter type**

Submitter type	Supports	Neutral/ unsure	Does not support
Individuals	64	5	13
Community groups & NGOs	18	2	2
Local government & statutory bodies	17	1	1
Iwi, hapū & Māori organisations	5	0	2
Business & tourism/recreation sector	7	0	0
Expert & science organisations	5	0	1
Primary sector	4	0	1
<b>Total number of submissions</b>	<b>120</b>	<b>8</b>	<b>20</b>

## Key insights

### National and regional actions must be coordinated

Most submitters identified the need for nationally aligned, evidence-based programmes to improve impact and efficiency, and recognised the advantage of structured prioritisation over fragmented or ad hoc efforts. While some submitters felt that national direction could complement existing efforts led by iwi, hapū, local government and conservation volunteers, others warned that increased centralisation might undermine existing local initiatives. A few raised concerns that additional national-level planning could divert resources away from on-the-ground delivery.

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We suggest regional agencies also have the flexibility to recognise and adopt additional species and habitat priorities. These regional specific priorities could sit alongside the nationwide priorities and be part of an additional co-ordinated effort at a regional level.

*Waytemore Farms Limited, Waytemore Forests Limited and Kauri Hiwi Limited*

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### Scope and prioritisation methods should be defined

Submitters called for more information on how species or habitats would be prioritised and how decision-making frameworks would be applied. They requested clear definitions for what constitutes 'degraded' or 'high-priority' habitats due to perceived ambiguity or inconsistency in the terminology. Differing views were shared on whether biodiversity value should be framed primarily in terms of ecological, cultural or economic value. There was broad support for ecosystem-based approaches that address a broad range of ecosystems across marine, freshwater

and terrestrial (including urban) environments, rather than focusing on species or habitats. Additionally, ecosystem- and landscape-based approaches that address habitat degradation and species loss simultaneously were endorsed. Many submitters called for urgent action to tackle browsers, weeds, predators, sedimentation, habitat fragmentation and other systemic drivers of biodiversity loss.

### **Partnership with iwi, hapū and local communities is important**

There was strong support for embedding partnerships with iwi, hapū and local communities throughout the process. Submitters emphasised the need to ensure that priorities are determined with iwi and hapū, and that mātauranga Māori and community perspectives are incorporated into planning and implementation. Submitters viewed mātauranga Māori and local stewardship as essential to durable, place-based solutions. Resourcing and decision-making authority were highlighted as critical components of meaningful partnership.

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Action 2 should explicitly recognise the leadership role of iwi and hapū in biodiversity restoration and species recovery, consistent with Te Tiriti o Waitangi responsibilities. Mātauranga Māori must be a co-equal knowledge system in programme design and delivery. Restoration programmes should also aim to reconnect tangata whenua to ancestral landscapes and taonga species.

*Te Hiku o Te Ika Conservation Board*

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### **There is a need for integration with climate change action**

There was broad support for combining biodiversity restoration with climate adaptation and mitigation through nature-based solutions (for example, wetland restoration). Some also felt that initiatives that also deliver climate resilience benefits (for example, flood mitigation or carbon sequestration) in line with the Ministry for the Environment's [National Adaptation Plan](#) should be prioritised. Some submitters also noted the need to factor in changing environments due to climate change when planning for restoration, so that ecosystems can endure into the future. However, a small number of submitters felt that linking biodiversity with climate action falls outside the scope of conservation policy.

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... it is critical that climate change is front and centre when these priority programmes are being designed. Decisions on which locations, species and ecosystems to protect and restore must take into account future long-term climatic and other changes. For example, coastal ecosystems will need to migrate inland over time as sea levels rise, and it is vital that protection/restoration programmes include these (current) inland areas to prevent urban/infrastructure development from impeding retreat/migration in the future.

*Nature and Climate Group of the Nelson Tasman Climate Forum*

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### **The delivery of programmes is key**

Submitters agreed that for this action to succeed, it must move beyond prioritisation lists to deliver concrete, measurable outcomes. They consistently called for credible planning, long-term funding, and transparent reporting supported by clear metrics and targets to demonstrate progress and justify investment. Many raised concerns about how restoration programmes would be sustained over time once initial objectives have been met.

A few submitters expressed resistance to the use of aerial toxins and other pest control measures, including those that could threaten valued introduced species, such as deer and tahr.

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

## Critical action 3

Develop a biodiversity investment prospectus to attract and direct external investment into biodiversity priorities.

### Early engagement feedback

Feedback received during early engagement highlighted the importance of having a well-developed biodiversity prospectus to attract diverse funding, including offshore investment, by clearly outlining project benefits and tailoring content to different funders. Participants also stressed the need to protect Māori cultural and intellectual property, ensuring that whānau, hapū and iwi retain rangatiratanga over data related to taonga species and cultural knowledge.

### Overview of public submissions

In total, 150 submitters provided feedback on critical action 3, of whom 138 indicated their level of support (Table 6).

**Table 6: Level of support for critical action 3 by submitter type**

Submitter type	Supports	Neutral/unsure	Does not support
Individuals	45	17	19
Community groups & NGOs	14	2	4
Local government & statutory bodies	12	1	0
Iwi, hapū & Māori organisations	3	0	3
Business & tourism/recreation sector	7	0	0
Expert & science organisations	4	1	1
Primary sector	5	0	0
<b>Total number of submissions</b>	<b>90</b>	<b>21</b>	<b>27</b>

## Key insights

### Private funding should be additional to public funding, not a replacement

Submitters agreed that increasing the funding base for biodiversity work was desirable, and some signalled their hope for their iwi/hapū/community projects to be included in the prospectus. However, many submitters commented that biodiversity is the Government's responsibility and that conservation work should not be reliant on private funding. There was a strong feeling that external finance should be a supplement, not a substitute, for government funding. Biodiversity is a national responsibility, not an economic asset.

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We would be concerned if increased revenue from other sources such as external investments resulted in a decrease in the Vote Conservation and other public-funded sources.

*Environment Institute of Australia and New Zealand*

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I do not support increased reliance on external investment and philanthropy. Conservation is a core responsibility of the government and must be adequately funded.

*Individual submitter*

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### Transparent processes and place-based leadership are needed

A strong emphasis was placed on transparency and the selection of projects based on clear ecological, iwi, hapū and community priorities. There was clear support for equitable access to funding and mechanisms that prioritise Māori-led initiatives. Many highlighted the importance of Treaty partnership as a core principle, calling for co-design with Māori, the embedding of Māori world views and priorities, and support for iwi-led or partnered projects. Submitters also called for safeguards to ensure that investment delivers credible conservation outcomes and does not compromise community or Māori priorities.

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The Crown must also prioritise iwi/hapū and Māori-led projects and take meaningful steps to ensure that these projects are included in any prospectus that is developed.

*Ngāti Manuhiri Settlement Trust*

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### There are fears over investor influence and a need for transparency in investment outcomes

Many submitters expressed concern that private investment could be short term and unpredictable, making long-term planning difficult. They feared that investor preferences may skew funding towards marketable or flagship species, potentially sidelining broader biodiversity goals. Some warned of greenwashing risks, where businesses might use the prospectus to appear environmentally responsible without

delivering genuine outcomes. To address these concerns, submitters called for a clear framework to measure and report on investment outcomes, including wider benefits such as social and cultural impacts, climate change mitigation, carbon sequestration, erosion control, flood attenuation, and freshwater quality.

We require further clarity on the specific content of the investment prospectus before we can support this action. It remains unclear what returns or benefits will be offered to investors in exchange for their contributions to biodiversity priorities. Without a transparent framework, private investments may dilute governmental conservation priorities and compromise the interests of local communities.

*Environment Southland*

## Critical action 4

Generate new revenue from public conservation lands and waters to invest back into biodiversity.

### Early engagement feedback

Feedback received during early engagement supported the development of a better revenue model to ensure sustainable Crown funding for biodiversity conservation but also raised concerns about relying on private funding without robust data to guide investment. It was also noted that regional and local government involvement is essential to the success of this work.

### Overview of public submissions

In total, 155 submitters provided feedback on critical action 4, of whom 142 indicated their level of support (Table 7).

**Table 7: Level of support for critical action 4 by submitter type**

Submitter type	Supports	Neutral/ unsure	Does not support
Individuals	32	16	30
Community groups & NGOs	12	5	6
Local government & statutory bodies	10	3	2
Iwi, hapū & Māori organisations	6	1	2
Business & tourism/recreation sector	5	1	1
Expert & science organisations	4	2	0
Primary sector	4	0	0
<b>Total number of submissions</b>	<b>73</b>	<b>28</b>	<b>41</b>

## Key insights

### **Financial sustainability should be balanced with public and cultural access**

A recurring theme across submissions was the tension between the need for sustainable funding and the principle of free access to nature. While many acknowledged that existing public funding is insufficient to address biodiversity loss, there was strong opposition to charging New Zealanders for access to national parks.

Submitters believed that commercial users (for example, tourism operators and concessionaires) and international visitors should contribute financially, although industry members asked for recognition of the contribution that many resource users already make on a voluntary basis.

Submitters raised concerns that monetising nature risks undermining its intrinsic and cultural values and could exclude low-income individuals, customary users and community volunteers. Some viewed this approach as inconsistent with te ao Māori (the Māori world view) and the concept of taonga.

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**Biodiversity, whilst a critical foundation to our economy, should not be viewed solely as an economic asset from which to generate revenue. The positioning of biodiversity in such a way in the discussion document is challenging, and may risk alienating core parts of the conservation community.**

*Wellington, Southland, Bay of Plenty and Taranaki/Whanganui Conservation Boards*

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**... while generating revenue from commercial activities is a good idea, it should not negatively impact everyday users and visitors of PCL [public conservation land]. This approach could create a class system where only those who can afford it would be able to visit New Zealand's most special places.**

*Hawke's Bay Regional Council*

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The risk of over-reliance on a user-pays system was also highlighted, drawing attention to the impact of the global financial crisis and COVID-19 on tourism demand.

### **There should be reinvestment into local biodiversity**

Across both supportive and unsupportive submissions, there was a strong emphasis on transparent mechanisms for tracking revenue collection, allocation and biodiversity outcomes. Submitters sought assurance that new funds would directly support conservation, not business as usual or operational costs. Supporters also advocated for locally generated revenue to be reinvested within the regions or sites from which it was sourced, with an emphasis on reinforcing community stewardship and local kaitiakitanga (guardianship). Some submitters also called for revenue to be distributed beyond Crown land to support biodiversity work on private land.

## Partnering with Māori and honouring Te Tiriti o Waitangi | the Treaty of Waitangi are critical

Many submitters, including Māori organisations, reinforced that any revenue-generating activity on public conservation lands and waters must uphold the principles of Te Tiriti o Waitangi | the Treaty of Waitangi. This includes partnership in design, implementation and benefit sharing. The generation of revenue must also be consistent with mātauranga Māori values and tangata whenua knowledge of a place and should directly benefit local iwi and communities, particularly when it involves taonga species or whenua (land) of significance.

There was strong support for transparent oversight and co-governance models to ensure that activities do not override existing rights and responsibilities under Te Tiriti o Waitangi | the Treaty of Waitangi or committed to through Treaty settlement obligations and to ensure equitable benefit sharing.

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Any revenue-generating activities on public conservation land must be co-designed and co-governed with mana whenua. No new revenue streams (e.g. tourism concessions, commercial leases, resource use) should be developed without the free, prior, and informed consent of relevant iwi/hapū.

*Te Hiku o Te Ika Conservation Board*

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I recommend that any revenue-generating activities be governed through shared decision-making with mana whenua and assessed through tikanga-based frameworks that honour whakapapa, tapu, and local kawa. Benefit-sharing arrangements must reflect the authority and obligations of mana i te whenua, not just the Crown's fiscal objectives.

*Individual submitter*

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## Safeguards are needed against ecological harm

There was broad agreement that the system must be carefully designed with robust frameworks to minimise any ecological degradation. It will be important to strike the right balance between economic goals and the need to protect biodiversity. Many submitters called for the prohibition of high-impact activities such as mining or large-scale development.

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Increasing visitor numbers with a focus on quantity not quality has the potential for degraded amenity and reduced visitor enjoyment. Seeking additional revenue opportunities through increased mining, grazing, private lodges, or aircraft may all generate negative non-remedial consequences for biodiversity and the environment.

*Canterbury Aoraki Conservation Board |  
Te Rūnanga Papa Atawhai o Waitaha me Aoraki*

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## Critical action 5

Increase private investment in biodiversity by supporting business-sector demand and system integrity: including private sector nature-based financial disclosures, reporting and investment.

### Early engagement feedback

Feedback received during early engagement supported encouraging businesses to measure and mitigate their environmental impacts, while emphasising the need for adequate resourcing of Treaty partners to co-govern and manage whenua. There was also interest in designing mechanisms that enable iwi to access sustained conservation funding through partnerships and culturally grounded tourism opportunities.

### Overview of public submissions

In total, 160 submitters provided feedback on critical action 5, of whom 143 indicated their level of support (Table 8).

**Table 8: Level of support for critical action 5 by submitter type**

Submitter type	Supports	Neutral/ unsure	Does not support
Individuals	37	17	24
Community groups & NGOs	15	4	3
Local government & statutory bodies	13	3	1
Iwi, hapū & Māori organisations	4	1	2
Business & tourism/recreation sector	8	0	0
Expert & science organisations	6	0	0
Primary sector	4	0	0
Other	1	0	0
<b>Total number of submissions</b>	<b>88</b>	<b>25</b>	<b>30</b>

### Key insights

#### Investment mobilisation and corporate accountability are important

Submitters recognised that biodiversity outcomes require greater resourcing than current public investment levels allow. Some acknowledged that private sector involvement can foster innovation in financing instruments, such as biodiversity credits and impact investing. Submitters noted the potential to scale up operational delivery and attract international expertise through this action.

There was strong support for frameworks that drive corporate accountability, transparency and measurable impacts. Submitters called for accessible, centralised biodiversity data to help investors make informed decisions and track outcomes reliably. They also expressed interest in aligning with frameworks such as the Taskforce on Nature-related Financial Disclosures (TNFD).

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We strongly support the intent to grow commercial investment in biodiversity, especially through frameworks that drive corporate accountability, transparency, and meaningful impact. A system of nature-based financial disclosures has the potential to shift significant capital toward ecological regeneration, aligning the private sector with national and global biodiversity goals.

*800 Trust*

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Some submitters emphasised the need for safeguards such as independent audits, public reporting and benefit-sharing mechanisms. Some were sceptical of voluntary disclosure schemes, fearing greenwashing or superficial compliance, especially if investments prioritise carbon outcomes without corresponding biodiversity gains.

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As this system is implemented, it's essential to establish clear and measurable criteria for biodiversity outcomes. This will enable businesses to track their progress effectively and demonstrate the real impacts of their investments on biodiversity. Without established metrics, companies risk adopting superficial practices that fail to yield significant results.

*Tākaka Hill Biodiversity Group Trust*

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Submitters linked the success of this action to others – particularly critical actions 3 (investment prospectus), 4 (revenue generation from public land) and 7 (monitoring indicators) – highlighting the need for coordinated, system-wide implementation.

### **Partnerships should be grounded in Te Tiriti o Waitangi | the Treaty of Waitangi**

Many submitters stressed that successful investment models must reflect Treaty principles, uphold mana whenua rangatiratanga and integrate mātauranga Māori alongside Western ecological science. Māori submitters emphasised the importance of co-design, protecting mana whakahaere (governance), and ensuring that private arrangements do not marginalise iwi and hapū.

## Public good needs to be balanced with private involvement

Some submitters expressed concern that increasing private sector involvement risks commodifying biodiversity, shifting the focus from intrinsic values and kaitiakitanga to financial returns. There were also fears that private investment could lead to the loss of public access or control over public conservation lands and waters and may allow the Government to divest from core biodiversity responsibilities.

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Without robust safeguards and equity principles, there is significant risk that private sector involvement in biodiversity could lead to:

- Greenwashing, where companies promote biodiversity credentials without meaningful change
- Commodification of nature, where ecosystems and species are treated as market assets
- Exclusion of tangata whenua, unless Māori rights, interests and knowledge systems are fully embedded in the design.

*Te Hiku o Te Ika Conservation Board*

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## The feasibility and implications of implementation need to be considered

Submitters questioned the feasibility of the 2030 timeline and called for the inclusion of interim milestones to measure progress. Concerns expressed included the potential for increased regulatory burden, punitive compliance mechanisms and unclear incentives that could arise from the implementation of private investment models.

## Critical action 6

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Increase the protection of biodiversity on private and Māori land by improving the accessibility and coordination of government support and incentives.

### Early engagement feedback

Feedback received during early engagement supported recognising the role of private, Māori and Crown land in biodiversity conservation but also called for clear, transparent criteria for accessing support and incentives. It was also emphasised that Māori should not have to compete with other sectors for funding and that implementation details will be key to gaining wider support.

## Overview of public submissions

In total, 152 submitters provided feedback on critical action 6, of whom 136 indicated their level of support (Table 9).

**Table 9: Level of support for critical action 6 by submitter type**

Submitter type	Supports	Neutral/ unsure	Does not support
Individuals	63	6	11
Community groups & NGOs	17	3	2
Local government & statutory bodies	13	1	0
Iwi, hapū & Māori organisations	3	2	0
Business & tourism/recreation sector	5	0	0
Expert & science organisations	6	0	0
Primary sector	4	0	0
<b>Total number of submissions</b>	<b>111</b>	<b>12</b>	<b>13</b>

## Key insights

### **There is strong support for improved access to support mechanisms**

Submitters emphasised the importance of acknowledging and supporting landholders who already manage and restore biodiversity on private or Māori land. There was widespread support for this action, especially given the high proportion of threatened biodiversity found on private land. Many submitters offered suggested areas of focus for the action, such as long-term funding for covenants, biodiversity coordinators or the development of a centralised system to coordinate the delivery of a range of support and incentives.

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Regarding accessibility, the biggest barrier to landowners accessing the existing support and funding mechanisms is simply the under-resourcing of said mechanisms. Rural landowners know where to find support and QEII already has more demand than we can meet. Improving the salience of these mechanisms among landowners (landowners understand the support that is available to them) is fruitless unless that support is resourced enough to be available. The reference to improving accessibility should instead be focused on increasing the amount of support available from organisations such as QEII and regional councils.

*QEII National Trust*

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Submitters stressed that landowners, land managers and communities should help set biodiversity priorities to guide funding decisions. Past efforts were seen to have been hindered by fragmented support and short-term funding, prompting calls for stable, well-resourced delivery systems that are easy to access. Many suggested scaling up existing mechanisms with proven success. It was also highlighted that the main issue is not accessibility but the amount of funding.

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The core of this proposal is to improve the accessibility of existing support schemes, for example, the QEII National Trust, Ngā Whenua Rāhui, and the Nature Heritage Fund. This would be an excellent idea if a lack of awareness about existing support schemes was a significant barrier to biodiversity protection on private land. My understanding, however, is the opposite: landowner demand for these schemes exceeds available funding.

*Parliamentary Commissioner for the Environment*

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However, some submitters cautioned that relying on voluntary action alone was not enough and argued that support and incentives should be used alongside effective regulatory protections to address the drivers of biodiversity loss.

### **There is support for rangatiratanga and mātauranga Māori**

Several submitters highlighted the importance of partnership-based approaches that reflect te ao Māori perspectives, recognise rangatiratanga and enable Māori-led decision making. Some submitters emphasised that mechanisms must respect the principles of Te Tiriti o Waitangi | the Treaty of Waitangi as well as addressing the application of support and incentives to Māori land. Ngā Whenua Rāhui was raised as a successful existing initiative. A small number of submitters noted that the multi-ownership models associated with Māori land currently make it difficult to access funding and support.

### **There are some concerns around possible implications**

Concerns were raised by a small number of submitters that increased government 'support' could lead to restrictions on the use of private land or a requirement for access to private land. A minority expressed discomfort with differential treatment for Māori or covenanted land and advocated for a 'land-neutral' approach to funding and support. Conversely, a few submitters suggested that Māori land should have its own specific support mechanisms. A few submitters objected to this action if it supported the use of certain pest control methods, such as trapping and toxins.

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If this could mean protecting habitats and restoration of wetlands and native bush, I would strongly support. Sadly, at present all it means is poison and kill animals. We strongly oppose this.

*Kumeu Colony Cats & Nestleby Grove Sanctuary*

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### **More information is needed on scope and implementation**

Some submitters requested clarification on whether this action involves voluntary incentives or introduces new compliance obligations. There were also queries about which agencies would lead its implementation, how coordination across central and local government would function, and how duplication with existing programmes would be avoided. Submitters expressed interest in how success would be evaluated, suggesting the use of specific ecological and cultural indicators to track progress.

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

## Critical action 7

Agree and implement an achievable set of priority indicators for monitoring progress on national targets, monitoring the effectiveness of interventions, and meeting statutory and international reporting requirements.

### Early engagement feedback

Feedback received during early engagement highlighted that this critical action lacks sufficient detail to be considered robust. Suggestions included establishing indicators to monitor progress across diverse boundaries, integrating mātauranga Māori alongside Western science and adopting cultural health assessment tools such as the mauri-o-meter to support evidence-based decision making.

### Overview of public submissions

In total, 161 submitters provided feedback on critical action 7, of whom 148 indicated their level of support (Table 10).

**Table 10: Level of support for critical action 7 by submitter type**

Submitter type	Supports	Neutral/ unsure	Does not support
Individuals	59	9	11
Community groups & NGOs	20	1	1
Local government & statutory bodies	18	0	0
Iwi, hapū & Māori organisations	8	0	2
Business & tourism/recreation sector	7	0	0
Expert & science organisations	6	1	0
Primary sector	3	0	1
Other	1	0	0
<b>Total number of submissions</b>	<b>122</b>	<b>11</b>	<b>15</b>

## Key insights

### Monitoring and reporting are essential

Submitters advocated for monitoring and reporting on progress against the objectives and outcomes of the Biodiversity Strategy to provide transparency about the state of New Zealand's biodiversity, promote public accountability and support decision making. Monitoring was seen as being essential for understanding the state of biodiversity and guiding effective action.

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Enhance the alignment of monitoring and reporting across agencies and provide a straightforward framework to assist in monitoring Te Mana o Te Taiao outcomes.

*Hawke's Bay Regional Council*

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### Stable investment in accessible infrastructure and national datasets is needed

There was widespread concern about the lack of long-term investment in monitoring and data systems to date. Submitters called for stable funding and well-resourced delivery systems, with advice to build on existing platforms that are accessible, standardised and legally compliant, such as the Land Resource Information System.

Submitters emphasised the need to collate data across government agencies into a single, accessible platform that can break down the data for analysis. Maintaining national datasets and ensuring data quality were seen as critical. There were calls for clarity around terms like 'priority indicators' and 'achievable', and questions about baselines, measurement methods and data sharing protocols.

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New Zealand needs a monitoring system that regularly collects and reports (in one place) data on key biodiversity trends on an ongoing basis.

*Parliamentary Commissioner for the Environment*

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### Standardised and integrated monitoring indicators should be used

There was support for using simple, standardised monitoring indicators, including those already available through existing reporting requirements (for example, farm plans and statutory reports). Submitters also recommended integrating social and economic indicators and aligning with broader government initiatives like the sustainable finance taxonomy and nature markets.

### Mātauranga Māori and co-design are important

Many submitters advocated for indicators being grounded in mātauranga Māori and co-developed with iwi and hapū. They also wanted the systems used to address outstanding issues regarding data sovereignty and intellectual property rights.

### **The approach should be community led and practical**

Submitters asked that data collection be decentralised and driven from the bottom up, with training and support for communities to use realistic, locally developed methods.

### **There is a risk of diverting resources**

Concerns were expressed that a focus on monitoring would detract from on-the-ground action, leading to worse outcomes for biodiversity. Submitters warned against complex and burdensome requirements, particularly for iwi, community groups and private landowners.

### **Timeframes need to be shorter**

Some submitters questioned why the delivery of this action would take until 2030, noting that monitoring frameworks and data systems already exist. There were calls for faster implementation and interim milestones.

### **There is a tension between the need for international alignment and local relevance**

There were mixed views on whether it is more important to align with international reporting requirements and use international systems and initiatives or to focus on the needs at a particular site where the decision is being made.

## **Critical action 8**

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**Support Māori to use knowledge systems, including mātauranga, in decision making and biodiversity management.**

### **Early engagement feedback**

Feedback received during early engagement supported the integration of mātauranga Māori into biodiversity research, policy and conservation, describing it as being long overdue and essential for more balanced and effective outcomes. They called for Māori authority over mātauranga, meaningful engagement with knowledge holders, investment in capability building, and positioning mātauranga at the centre of the biodiversity system as a dynamic and evolving knowledge base.

## Overview of public submissions

In total, 153 submitters provided feedback on critical action 8, of whom 141 indicated their level of support (Table 11).

**Table 11: Level of support for critical action 8 by submitter type**

Submitter type	Supports	Neutral/ unsure	Does not support
Individuals	62	11	9
Community groups & NGOs	19	2	1
Local government & statutory bodies	16	1	0
Iwi, hapū & Māori organisations	7	0	0
Business & tourism/recreation sector	5	0	0
Expert & science organisations	6	0	0
Primary sector	2	0	0
<b>Total number of submissions</b>	<b>117</b>	<b>14</b>	<b>10</b>

## Key insights

### **Mātauranga Māori should be applied in all conservation practices**

Submitters expressed that this action should enable mātauranga Māori to be applied by Māori and reflect local values and priorities. Many encouraged the normalisation, sharing and intergenerational use of Māori ecological world views as part of all conservation efforts.

One submitter recommended using mātauranga-based indicators – for example, mauri (life force), mahinga kai (species gathered for food) or taonga species – as success metrics in restoration and monitoring. Others noted that this action should acknowledge the diversity within mātauranga practice, recognising that not all Māori engage with mātauranga in the same way and that practices differ between iwi.

Submitters noted that mātauranga integration supports or intersects with other critical actions. As such, this critical action may serve as a foundational mechanism across the biodiversity system.

### **Kaitiaki should be empowered to lead the application of their knowledge**

Submitters emphasised that genuine partnership under Te Tiriti o Waitangi | the Treaty of Waitangi requires the integration of te ao Māori and mātauranga in decision making. Most submitters endorsed initiatives that empower mana whenua to lead in protecting and managing taonga species and ecosystems. Suggestions included developing co-management agreements that recognise Māori as kaitiaki and involving tangata whenua in the design, not just the application, of knowledge systems and management frameworks. Some noted the importance of prioritising

areas where Treaty settlement obligations remain unmet, while also sharing learnings from successful examples.

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This action should go further by committing to realignment of state systems where needed, and by resourcing hapū, iwi and local practitioners to govern using their own knowledge and tikanga. True support means investing in autonomy, infrastructure, and transmission of practice, not just inclusion at the margins of policy. This is a matter of integrity, not cultural input.

*Individual submitter*

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### **Complementary knowledge systems should be used**

Many submitters believed that mātauranga Māori and Western science, when used together, provide a more holistic, adaptive and place-based framework for biodiversity management. Submitters supported the weaving of diverse knowledge systems and emphasised the importance of recognising the mana of mātauranga Māori as equal to that of other systems. Some called for the removal of institutional barriers that require tangata whenua to translate their knowledge into Crown-defined formats.

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To adequately address the ecological and climate crises, the full spectrum of knowledge systems needs to be used together to guide decision making for biodiversity. ... The 'braided knowledge' approach interweaves scientific, local and Mātauranga knowledge equally, aiming to form a deeper and more holistic understanding of problems and identify collaborative, effective solutions.

*Queenstown Lakes District Council*

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### **Increasing the capability of community groups is important**

Some submitters asked how mātauranga might be shared more widely – particularly with non-Māori communities, including local landowners and conservation volunteers – while respecting the rights of knowledge holders. Submitters saw a need to ensure that community groups are trained and given the resources to better connect with mana whenua and better understand mātauranga Māori in ecological stewardship. Specific proposals included rangatahi (youth) cadetships in biodiversity practice.

### **Sustained funding and capacity building are needed**

Multiple submitters emphasised the need for dedicated and long-term investment to support mātauranga Māori within biodiversity work. This includes capacity-building initiatives, formal recognition of mātauranga holders, and targeted resourcing for iwi-, hapū- and whānau-led ecological stewardship. Submitters also highlighted the need for clearer guidance on how to build capacity in meaningful and effective ways.

## **Mātauranga should be protected and safeguarded**

Submitters advocated for the development of safeguards to ensure that mātauranga is not misused, exploited or accessed without the permission of those who hold it. There was consistent interest in the principles of Māori data sovereignty and culturally aligned governance mechanisms. Some submitters called for improved transparency in data access and use. One proposal included co-developing a national ethics and access framework for mātauranga Māori, in partnership with iwi experts.

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**Mātauranga Māori and its important relationship with biodiversity is not adequately protected by intellectual or cultural property legislation currently. The appropriate use of and intergenerational transfer of mātauranga māori is the inalienable right of mana whenua at all times.**

*Ngā Iwi o Taranaki*

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## **There is a perceived dilution of scientific standards**

A small number of submitters expressed concern that incorporating mātauranga may compromise scientific objectivity or lead to unclear management decisions. Some asserted that there is a risk of prioritising a single knowledge system, which could lead to perceived inequity for other knowledge holders or stakeholder groups. There were also concerns that limited funding could be diverted away from existing science-led approaches. A minority of submitters questioned whether it is appropriate for DOC to support mātauranga Māori and argued that funding should be directed towards core biodiversity conservation efforts.

## **Critical action 9**

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**Capture and embed the lessons from existing partnership-based delivery models for biodiversity and biosecurity management to inform decisions on future programmes.**

### **Early engagement feedback**

Feedback received during early engagement strongly supported collaborative, partnership-based models, with emphasis on equitable decision making, place-based protocols and learning from successful approaches. It was also noted that clearer direction in the implementation plan is needed to support locally led restoration efforts.

## Overview of public submissions

In total, 147 submitters provided feedback on critical action 9, of whom 137 indicated their level of support (Table 12).

**Table 12: Level of support for critical action 9 by submitter type**

Submitter type	Supports	Neutral/ unsure	Does not support
Individuals	57	12	10
Community groups & NGOs	23	1	2
Local government & statutory bodies	12	1	0
Iwi, hapū & Māori organisations	2	0	2
Business & tourism/recreation sector	6	0	0
Expert & science organisations	5	0	0
Primary sector	4	0	0
<b>Total number of submissions</b>	<b>109</b>	<b>14</b>	<b>14</b>

## Key insights

### Support for partnership models depends on proven effectiveness and independent evaluation

Submitters generally endorsed this action, reflecting the broad support for collaborative models. However, submitters emphasised the need for robust, impartial evaluation of both successful and unsuccessful examples, ideally conducted independently, to guide future programmes.

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Capturing lessons, good and bad, for steering future decisions. To do this requires impartiality and again highlights the need for independent analysis of the outcomes to date.

*Individual submitter*

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Some questioned whether this action introduces genuinely new activity or duplicates existing practice. A number of submitters argued that biodiversity indicators continue to decline, suggesting that current models have been ineffective. Concerns were also raised that the need to document lessons may divert funding from practical restoration and management.

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We are unsure how much additional value this action will contribute with the five-year timeframe of the Plan, as we would expect this type of work to be occurring as part of business-as-usual.

*Napier City Council*

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### **Embedding Māori knowledge and having inclusive delivery models are essential**

Submitters consistently emphasised that mātauranga Māori and Te Tiriti o Waitangi | the Treaty of Waitangi are essential to biodiversity outcomes, calling for resourcing and the recognition of kaupapa Māori (customary practice) delivery models within system-wide learning.

Some submitters have felt marginalised by current partnership models. They noted that rural contributions and localised ecological knowledge risk being undervalued.

### **Institutional learning and system-wide capability should be strengthened**

Some submitters stressed that programme examples and models must be intentional, well resourced and accessible. Submitters called for well-resourced learning infrastructure, such as knowledge hubs, shared tools and feedback mechanisms, to support best practice and uplift emerging or under-resourced initiatives.

Several submitters framed this action as a pathway to institutionalising adaptive management models and applying a ka mua, ka muri (looking to the past to inform the future) approach.

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The whakataukī 'Ka Mua, Ka Muri' ... implies that [by] reflecting on and understanding past activities, we can make informed decisions about future actions. Otherwise, we make the same mistakes and are no better off.

*Sustainable Wairarapa*

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### **We should ensure stability and build on proven models**

Submitters voiced concern that short funding cycles, staff turnover, and the discontinuation of programmes and policies undermine institutional memory and the ability to act on lessons learned. Many emphasised the value of learning from and scaling existing programmes such as [Predator Free 2050](#) and [Jobs for Nature](#).

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Current economic circumstances make this crucial, and using existing successful models as a template is wise to avoid reinventing the wheel.

*Chatham Islands Landscape Restoration Trust*

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### **Clarification is needed about the scope and implementation**

Several submitters sought additional information about which partnerships would be evaluated and how lessons would be embedded. A few expressed reluctance towards increasing the role of non-governmental organisations (NGOs) or centralised agencies in decision making.

## Critical action 10

Encourage optimal investment in nature-based solutions, including the restoration and protection of native ecosystems for carbon and biodiversity benefits, by improving the evidence base, developing case studies and operationalising existing research.

### Early engagement feedback

Feedback received during early engagement supported the promotion of nature-based solutions in under-researched ecosystems, such as peatlands, recognising their potential to enhance biodiversity and carbon sequestration. It was also noted that building a strong evidence base will be important for making informed decisions and attracting future investment.

### Overview of public submissions

In total, 150 submitters provided feedback on critical action 10, of whom 140 indicated their level of support (Table 13).

**Table 13: Level of support for critical action 10 by submitter type**

Submitter type	Supports	Neutral/ unsure	Does not support
Individuals	61	7	9
Community groups & NGOs	21	2	1
Local government & statutory bodies	13	0	0
Iwi, hapū & Māori organisations	8	0	1
Business & tourism/recreation sector	8	0	0
Expert & science organisations	6	0	0
Primary sector	3	0	0
<b>Total number of submissions</b>	<b>120</b>	<b>9</b>	<b>11</b>

## Key insights

### **Nature-based solutions offer broad climate and biodiversity benefits**

Many submitters recognised the potential for nature-based solutions to deliver a range of climate-related outcomes, including mitigation, carbon sequestration, adaptation and resilience across rural and urban environments. Many also emphasised the opportunity to address both the climate and biodiversity crises simultaneously. However, some cautioned that a narrow focus on carbon outcomes, for example, could marginalise biodiversity priorities.

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**Raukawa supports this action and acknowledges the potential for nature-based solutions to deliver wide-ranging environmental, social, and economic benefits when designed in partnership with iwi and grounded in local context.**

*Raukawa Settlement Trust & Raukawa Charitable Trust*

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### **There needs to be complementarity with existing conservation efforts and ecosystem protection**

Submitters stressed that nature-based solutions should complement, not replace, existing conservation interventions such as pest management, habitat restoration and species recovery. Several called for prioritising the protection and restoration of existing native ecosystems, including wetland, coastal and marine environments, over the creation of new forests.

Some submitters expressed conditional support, contingent on safeguards to maintain existing ecosystems and uphold section 4 of the Conservation Act 1987.

Concerns were also raised about the use of exotic monocultures for carbon sequestration due to risks such as fire vulnerability and negative impacts on native biodiversity.

### **Integrity, governance and inclusive partnerships are important**

Supportive and unsupportive submitters alike called for robust governance and integrity mechanisms to build trust in nature-based solutions as a policy tool.

Many highlighted the importance of meaningful involvement and leadership from local communities, iwi, hapū and landowners. Feedback affirmed the need to co-design nature-based solutions approaches with Māori, embedding mātauranga Māori, local tikanga (customs) and kaupapa Māori principles throughout the project design, implementation and monitoring stages.

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**Prioritise projects with co-benefits particularly where restoration contributes to whānau wellbeing, food and water security, cultural revitalisation, and climate resilience. Embed mātauranga Māori and tikanga in all stages of project design, implementation, and monitoring.**

*Te Hiku o Te Ika Conservation Board*

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### **There needs to be equitable access to funding and support**

Some submitters called for funding pathways that are proportionate to the expected outcomes and designed to support enduring solutions. There was strong support for systems that are accessible to small-scale, rural and under-resourced groups and organisations to ensure inclusive participation across sectors and communities.

### **An evidence-based approach and practical delivery are needed**

Some submitters highlighted the need for science and evidence to underpin nature-based solutions, including biodiversity monitoring, cost-benefit analysis, and the synthesis of research and case studies to guide effective investment.

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**We support an evidence-based approach to biodiversity including improving biodiversity monitoring, supporting mātauranga Māori approaches, sharing learnings across the country and improving the evidence base to drive investment in nature-based solutions.**

*Summit Road Society*

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At the same time, concerns were raised that overinvestment in frameworks or research could detract from practical, on-the-ground conservation work.

### **Terminology and relative priorities should be clear**

Submitters raised concerns about the lack of clarity in defining nature-based solutions and the operational detail for this critical action. Suggestions included avoiding financial framing (for example, 'investment'), clarifying terms like 'optimal', and providing better links between biodiversity and climate goals.

Questions were also raised about how nature-based solutions would be weighted within the broader suite of biodiversity interventions and how investment priorities would be determined.

# Theme 4: Increased capability and support enables New Zealand to address the biodiversity crisis

## Critical action 11

Develop a cross-sector plan to address the most important capability gaps in the biodiversity system.

### Early engagement feedback

Feedback received during early engagement emphasised the importance of retaining and sharing intergenerational knowledge held by iwi, hapū and Māori organisations and learning from local experts to support leadership transitions. There was strong support for hapū-led mobilisation, with the Government playing a more supportive role, and for exploring mechanisms like biodiversity credits to fund locally led initiatives. Programmes such as Jobs for Nature and [Ngā Awa](#) were cited as successful models, and participants called for greater political commitment, sustained funding and the development of a mātauranga Māori capability plan to ensure culturally grounded, inclusive biodiversity management.

### Overview of public submissions

In total, 163 submitters provided feedback on critical action 11, of whom 144 indicated their level of support (Table 14).

**Table 14: Level of support for critical action 11 by submitter type**

Submitter type	Supports	Neutral/ unsure	Does not support
Individuals	61	10	7
Community groups & NGOs	21	3	1
Local government & statutory bodies	15	1	0
Iwi, hapū & Māori organisations	6	1	0
Business & tourism/recreation sector	6	0	0
Expert & science organisations	7	0	0
Primary sector	3	0	1
Other	1	0	0
<b>Total number of submissions</b>	<b>120</b>	<b>15</b>	<b>9</b>

## Key insights

### Capability is foundational to biodiversity outcomes

Submitters consistently viewed capability as a central pillar of successful biodiversity management, not a peripheral issue. Capability gaps were seen to be fundamentally constraining delivery, especially in the context of environmental threats and the climate crisis.

It was noted that there have been longstanding shortages across technical, operational and cultural roles, including ecologists, taxonomists, marine experts, kaitiaki and strategic leadership. Community groups also highlighted the need for tools and support systems, such as data platforms, monitoring frameworks and training opportunities.

### Stable and long-term investment underpins effective systems

Across submitter types, funding continuity was identified as a barrier to building and retaining capability. The deprioritisation and defunding of biodiversity by the Government was seen to have contributed to job losses, reduced research capacity and made the sector unattractive to new entrants.

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Understanding capability gaps in the sector could be useful, however using funding to develop more plans when there is no funding or capability to plug those gaps seems like a waste of effort.

*QEI National Trust*

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Many submitters highlighted the success of Jobs for Nature in upskilling people and called for its re-establishment or the development of a similar long-term programme to support workforce development.

### Community- and Māori-led capability must be supported

Local communities and Māori-led organisations face challenges due to limited long-term funding and resources. Submitters called for targeted investment to build place-based capability and support kaupapa Māori approaches.

There was strong advocacy for empowering iwi, hapū and marae as kaitiaki, with capability planning aligned to Treaty principles. This includes elevating mātauranga Māori, supporting rangatiratanga and creating clear pathways for rangatahi Māori into biodiversity careers.

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A capability plan ... must allow hapū and iwi to define their own capability needs and invest in the infrastructure, autonomy, and long-term resourcing required to uphold their responsibilities. True capability includes decision-making authority, access to funding, digital tools, safe working conditions, and validation of tikanga-based approaches. It is not just about building skills, but about removing structural barriers and enabling communities to lead restoration in ways that reflect their whakapapa, values, and local conditions.

*Individual submitter*

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### **A cross-sector approach is needed**

Submitters emphasised the need for a well-coordinated, cross-sector approach to overcome fragmentation and duplication across agencies, iwi, hapū, NGOs, researchers and community groups. Workforce planning should span government agencies, landowners, community groups and the private sector.

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**It must be inclusive, practical, and long-term focused, building skills and leadership across all levels and sectors to ensure resilient and effective biodiversity conservation into the future.**

*800 Trust*

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### **Education and training are critical for long-term capability**

Submitters called for investment in education, including scholarships, apprenticeships, vocational training and professional development. There were calls to embed biodiversity capability building in schools, marae and local training institutions to grow the next generation of guardians.

### **Clarity and evidence are needed to guide action**

Some submitters sought further information on what constitutes a 'capability gap', which sectors would be involved and how priorities would be determined. Others questioned whether a skills shortage is truly the issue, suggesting that a lack of funding to employ skilled people may be the more significant barrier.

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**... this would be a good idea if a lack of appropriately trained people was holding back conservation work. As far as I am aware, however, it is not.**

*Parliamentary Commissioner for the Environment*

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## Critical action 12

Increase New Zealanders' awareness of the value of our biodiversity, show how they can make a difference to biodiversity in their communities, and drive urgency and momentum for action.

### Early engagement feedback

Feedback received during early engagement suggested that funding to support hapū-led initiatives is needed to 'mobilise' tangata whenua – to enable people to participate and address capability issues. There was a call for a specific focus on developing comprehensive community engagement and education programmes to raise awareness about biodiversity issues and empower communities to participate and engage in conservation efforts.

### Overview of public submissions

In total, 150 submitters provided feedback on critical action 12, of whom 137 indicated their level of support (Table 15).

**Table 15: Level of support for critical action 12 by submitter type**

Submitter type	Supports	Neutral/ unsure	Does not support
Individuals	71	4	6
Community groups & NGOs	21	2	0
Local government & statutory bodies	14	0	0
Iwi, hapū & Māori organisations	6	0	0
Business & tourism/recreation sector	4	0	0
Expert & science organisations	6	0	0
Primary sector	3	0	0
<b>Total number of submissions</b>	<b>125</b>	<b>6</b>	<b>6</b>

### Summary of key insights

#### Public awareness of the biodiversity crisis is low and shaped by misconceptions

Most submitters agreed that public understanding of biodiversity issues is poor, with many highlighting the need to challenge the 'clean and green' myth of New Zealand. There was concern that the environment is widely perceived as being pristine and thriving, despite evidence to the contrary.

While most submitters supported increasing awareness of the biodiversity crisis, a small number felt the urgency was overstated, cautioning against 'scare tactics' or narratives that feel like propaganda.

## **Awareness must lead to action and shared responsibility**

Submitters emphasised that raising awareness alone is insufficient. Campaigns must encourage collective responsibility and provide clear, actionable steps for how individuals and communities can contribute. This includes sharing information on volunteering, donating and engaging with local initiatives.

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**Empowering individuals and communities with knowledge and practical ways to contribute is crucial to building a nationwide conservation movement.**

*800 Trust*

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## **Education underpins long-term behaviour change**

Many submitters stressed that sustained change requires education, not just awareness. Suggestions included embedding biodiversity topics in early childhood, school and tertiary curricula, and supporting lifelong learning to normalise kaitiakitanga and citizen stewardship from a young age.

## **Messaging needs to be locally relevant, solution focused and inclusive**

While many felt that the urgency for action should be conveyed strongly, others cautioned that a purely negative tone could demotivate people, so 'pragmatic optimism' is needed in messaging. Some encouraged the use of local success stories to inspire further engagement.

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**Awareness must not be fear-based or framed solely around loss. It must also uplift stories of connection, of local restoration, and of Indigenous leadership.**

*Individual submitter*

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The use of tailored messaging was encouraged to engage diverse groups who may have felt alienated by messaging in the past, such as farmers, rural communities, hunters, youth and urban residents.

Submitters also called for messaging to help people understand concepts such as why New Zealand's biodiversity is internationally important; how it underpins the economy; how it connects to aspects like mental health, climate change, clean water and a secure food system; and why we need to protect biodiversity now for future generations.

## **Partnering with local organisations will help instil local ownership**

Many submitters felt that partnering with local iwi, hapū and community groups would be vital to maximise outreach, engage people with locally relevant stories and foster a sense of local ownership.

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Biodiversity stories are not 'one-size-fits-all', they are shaped by place, language, history, and lived experience. Regional tailoring of national messaging, co-designed with iwi, can support deeper resonance with communities and ensure that campaigns foster genuine connection rather than surface-level visibility.

*Raukawa Settlement Trust & Raukawa Charitable Trust*

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## **Partnership with Māori is important during design and delivery**

Many submitters requested partnership with iwi and hapū during the design and delivery of initiatives. They called for the integration of Māori culture, mātauranga Māori and traditional knowledge into messaging, and support for community-led education and storytelling that is culturally authentic, is locally relevant and reinforces the role of iwi as tangata tiaki (guardians of natural and physical resources).

## **National coordination and consistent government messaging are needed**

Some submitters supported the idea of national leadership to facilitate the sharing of consistent, unified messaging and the creation of shared resources that local councils and communities can adapt to meet their needs. Some noted that inconsistent government narratives – particularly those prioritising economic growth over environmental protection – undermine public mobilisation and credibility.

## **Awareness campaigns must be cost effective**

A small number of submitters questioned the financial efficiency of awareness campaigns compared with direct interventions like pest control or habitat restoration. They urged that there be careful consideration of return on investment and alignment with broader biodiversity goals.

## Critical action 13

Establish cross-agency emerging-risks capability for domestic biosecurity to horizon scan, share intelligence and support decision-makers in prioritising emerging risk management.

### Early engagement feedback

No specific feedback was received during early engagement on this critical action.

### Overview of public submissions

In total, 138 submitters provided feedback on critical action 13, of whom 129 indicated their level of support (Table 16).

**Table 16: Level of support for critical action 13 by submitter type**

Submitter type	Supports	Neutral/ unsure	Does not support
Individuals	59	10	6
Community groups & NGOs	18	1	1
Local government & statutory bodies	15	0	1
Iwi, hapū & Māori organisations	4	0	1
Business & tourism/recreation sector	3	0	0
Expert & science organisations	7	0	0
Primary sector	3	0	0
<b>Total number of submissions</b>	<b>109</b>	<b>11</b>	<b>9</b>

### Key insights

#### **There is strong support for enhanced biosecurity capability and preparedness**

There was strong agreement across submissions on the value of enhanced biosecurity capability, with early detection being seen as a cost-effective safeguard against biodiversity loss.

Proactive horizon scanning and risk anticipation were considered essential, particularly for emerging threats in freshwater and marine environments. However, a few submitters suggested that immediate on-the-ground action should be prioritised over system-level intelligence building.

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**This proactive approach equips decision-makers with the information necessary to prioritise and implement effective management strategies, ultimately protecting biodiversity more efficiently.**

*Tākaka Hill Biodiversity Group Trust*

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### **Capability must translate into action**

While the value of analytical and planning tools was acknowledged, submitters emphasised that capability must include practical investment in people, training and on-the-ground implementation. Tools such as citizen science platforms (for example, [iNaturalist](#)), environmental DNA (eDNA), ArcGIS and improved national information systems were suggested to support threat identification. Local knowledge and community-based surveillance networks were also seen as being critical for identifying new or changing biosecurity risks.

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**There is a critical role for eDNA surveying and taxonomic barcoding in conservation and biosecurity ... That is the only way we will ever measure diversity, distribution, status and change.**

*Manaaki Whenua – Landcare Research*

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### **Clear governance and coordination are essential**

Submitters stressed the need for clearly defined agency roles and responsibilities to avoid duplication and confusion. Integrated, cross-agency collaboration and information sharing – particularly between central government, regional councils, iwi, hapū and community networks – were seen as being vital for effective implementation.

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**[The Trust] strongly supports Action 13, as working across agencies helps ensure that everyone has access to the same information and resources for risk management in the biodiversity restoration and protection space.**

*Styx Living Laboratory Trust*

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### **Treaty partnership and mātauranga Māori must be embedded**

Many submitters, especially Māori organisations, advocated for a partnership approach grounded in Te Tiriti o Waitangi | the Treaty of Waitangi. Some submitters advocated for recognising mātauranga Māori and the contributions of iwi/hapū-led monitoring networks in biosecurity planning and response. These perspectives were sometimes presented in the context of kaitiakitanga.

### **Strategic alignment is needed with existing programmes and pressures**

A few submitters recognised the alignment of this action with the Parliamentary Commissioner for the Environment's recommendation in his [Space invaders](#) report on developing capability for domestic emerging risks for environmental weeds and the Memorandum of Understanding between Te Uru Kahika, DOC and the Ministry for Primary Industries for biosecurity work. Alignment was also recommended with established regional surveillance systems and national strategies such as Predator Free 2050.

Climate change and trade were identified as key drivers of new and intensifying biosecurity risks in New Zealand that require consideration during the planning and response phases.

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With climate change there is also a regional biosecurity risk with the spread of unwelcome plant and pest species to new areas of the country as changing weather patterns mean previously cooler ecosystems become more hospitable to aggressive invaders.

*Waytemore Farms Limited*

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### **The scope should be clarified and resourcing concerns addressed**

Some submitters expressed confusion about the scope of emerging risks, including whether marine organisms, freshwater species, environmental weeds and feral browsers are included. A few referenced border-related risks, indicating misunderstanding about the domestic focus of the action.

Questions were also raised about funding – whether new allocations would be required or if existing budgets would be stretched – and whether this action would be prioritised by government agencies that are already under pressure.

# Appendix 1: List of submitters

## Submitters by type (total = 197)

### Individuals

91 individuals

### Community groups & non-governmental organisations (NGOs)

800 Trust

Abel Tasman Birdsong Trust

Banks Peninsula Native Forest Climate Change Group

Biodiversity Hawke's Bay

Capital Kiwi Project

Carbon Neutral NZ Trust

Chatham Islands Landscape Restoration Trust

Coromandel Watchdog of Hauraki

Driving Creek Conservation Park

Endangered Species Foundation

Environment and Conservation Organisations of NZ Inc.

Ferac NZ

Flora and Fauna of Aotearoa Society

Go Eco – Waikato Environment Centre

Kumeu Colony Cats & Nestleby Grove Sanctuary

Moths and Butterflies of New Zealand Trust

Nature and Climate Group of the Nelson Tasman Climate Forum

New Zealand Deerstalkers Association Inc. (NZDA)

New Zealand International Union for Conservation of Nature (NZ IUCN)

Orari River Protection Group

Routeburn Dart Wildlife Trust

Royal Forest and Bird Protection Society of New Zealand Inc.

Royal New Zealand Society for the Prevention of Cruelty to Animals Inc.

Sika Foundation

Southern Lakes Sanctuary

Styx Living Laboratory Trust

Summit Road Society

Sustainable Wairarapa

Tākaka Hill Biodiversity Group Trust

Te Araroa Trust

Thames Valley Deerstalkers Association

Whakatipu Wildlife Trust

Wild for Taranaki

World Wide Fund for Nature – New Zealand

Zealandia Te Māra a Tāne

### Local government & statutory bodies

Auckland Conservation Board

Auckland Council staff

Canterbury Aoraki Conservation Board/  
Te Rūnanga Papa Atawhai o Waitaha me Aoraki

Environment Canterbury

Environment Southland

Fish & Game New Zealand

Gisborne District Council

Greater Wellington

Hamilton City Council staff

Hawke's Bay Regional Council

Hurunui District Council

Napier City Council

New Zealand Conservation Authority (NZCA)

New Zealand Game Animal Council

Otago Regional Council

Parliamentary Commissioner for  
the Environment

QEII National Trust

Queenstown Lakes District Council

Te Hiku o Te Ika Conservation Board

Tongariro-Taupō Conservation Board

Waikato Conservation Board

Waikato Regional Council staff

Wellington, Southland, Bay of Plenty and  
Taranaki/Whanganui Conservation Boards

West Coast Tai Poutini Conservation Board

Western Bay of Plenty District Council

*Continued on next page*

## Submitters by type (total = 197)

### Iwi, hapū & Māori organisations

Moriori Imi Settlement Trust  
 Ngā Iwi o Taranaki  
 Ngāti Manuhiri Settlement Trust  
 Ngāti Tamaoho  
 Rangitāne o Manawatū Cultural Trust  
 Raukawa Settlement Trust &  
 Raukawa Charitable Trust  
 Te Arawa Ki Tai Charitable Trust  
 Te Ātiawa o Te Waka-a-Māui Trust  
 Te Kaahui o Rauru  
 Te Kāhui o Taranaki Iwi  
 Te Korowai o Ngāruahine Trust  
 Te Rōpū Pounanao o Ngāti Awa  
 Te Rūnanga o Ngāti Mutunga  
 Te Tira Whakamātaki  
 Te Tumu Paeroa Office of the Māori Trustee  
 Wharawhara 13 Lands Trust

### Business & tourism/recreation sector

Bay of Islands Maritime Park Inc.  
 Destination Queenstown & Lake  
 Wānaka Tourism  
 Fulton Hogan  
 Hanging Gardens  
 Lewis Tucker & Co.  
 Orion New Zealand Limited  
 Oxygen Consulting  
 The CarbonCycle Company  
 Titoki Landcare  
 Toha Network  
 Z Energy

### Expert & science organisations

Environment Institute of Australia and  
 New Zealand  
 Manaaki Whenua – Landcare Research  
 McGuinness Institute  
 Natural Solutions – Marine and Terrestrial  
 Ecologists Ltd  
 OSPRI  
 Prospect Consulting Ltd  
 Royal Society Te Apārangi  
 Species Aotearoa  
 Tahī  
 [Organisation name withheld at  
 submitter's request]

### Primary sector

Aggregate & Quarry Association  
 Federated Farmers of New Zealand  
 Fonterra  
 Minerals West Coast  
 New Zealand Federation of  
 Commercial Fishermen  
 New Zealand Minerals Council  
 Seafood New Zealand, NZ Rock Lobster  
 Industry Council Ltd and Pāua Industry Council  
 Waytemore Farms Limited, Waytemore Forests  
 Limited and Kauri Hiwi Limited

### Other

Animal Justice Party Aotearoa NZ Inc.