

Predator Free 2050 Strategy Review

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Email submission to: pf2050discussion@doc.govt.nz

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On behalf of
Richie Cosgrove CEO
New Zealand Fish and Game Council

1.0 Submission summary

Fish and Game appreciates the opportunity to comment on the Predator Free 2050 Strategy Review. Fish and Game engage in predator control education where appropriate and support predator control methods to protect our indigenous and valued introduced species. We support enabling iwi and hapu and communities to assist in predator control activities, and leadership and decision making. We support maintaining the targeted species list as it currently is, particularly as there are current doubts that eradication of these species can be achieved. We have concerns that several stated goals in this strategy review are not stepwise, measurable paths to an outcome, but more aspirational hopes for tools, technologies, and finances that are not available at present. We look forward to further communications and collaboration in this field, where possible.

2.0 The new 2030 goals

- 2.1 *Increase in community predator control activities by 25% by 2030.*
Fish and Game supports efforts to resource communities to engage in effective predator control measures.
- 2.2 *Iwi/ hapu leaders supported to actively participate in PF2050 projects, including in leadership.*
Fish and Game support iwi/hapu participation.
- 2.3 *By 2030, predator control projects are demonstrating significant increases in the population trends of native species.*
Fish and Game are neutral about this outcome. While this is a commendable goal, it is likely to be unachievable in the time frame. This goal could perhaps be strengthened by creating a limitation around the outcome, for example, predator control projects are demonstrating significant increases in the population trends of native species in one mainstream region / in one major urban area. There could also be difficulties in determining what 'significant' increases would look like, and what the definition of 'species highly threatened by predators' is.
- 2.4 *New Zealand's offshore predator-free island network to be managed to best practice biosecurity status by 2030.*
Fish and Game supports the offshore predator-free island network to be managed to best practice biosecurity standards by 2030.
- 2.5 *Mustelids and possums eradicated from a major city with a tested blueprint for expansion by 2030.*
Fish and Game supports mustelid and possum eradication from a major city. This would give vital data on the project's feasibility; however, relying solely on eradication as the marker of achieving this goal may make it too difficult to

achieve. Potentially looking at a level of predator suppression or increase in population of species impacted by predation may allow this goal to be reached.

2.6 *Mātauranga Māori is making demonstrable contributions to eradication outcomes by 2030.*

Fish and Game support Mātauranga Māori contributions to eradication outcomes. All inputs, scientific ways of thinking, and worldviews will be vital to achieve biodiversity gains.

2.7 *Predator eradication is complete or underway across 75% of New Zealand's offshore island network area by 2030.*

Fish and Game supports predator eradication to be complete or underway across 75% of New Zealand's offshore island network.

2.8 *Toolbox has expanded to include at least one: species specific toxin available in NZ, bait for introduced mammalian predators registered for use in NZ, lab proof-of-concept for science solution for affordable and scalable rat and/or stoat elimination.*

Fish and game are neutral about the use of toxins, as our licence holders are likely to have a variety of views on this topic.

2.9 *PF2050 has attracted significant investment from non-Crown funders.*

Fish and Game opposes a goal of attracting significant investment from non-Crown funders. We view this as an aspiration rather than a goal. A goal should be able to be achieved via a stepwise process; aspirations require circumstances aligning in positive ways to gain the desired outcome. While funding is vital, having this as a goal is potentially unnecessarily complicating the 2030 outcome. To create certainty, funding needs to be provided by the crown.

2.10 *Iwi/Hapu are satisfied that PF2050 projects are realising their aspirations in their rohe.*

Fish and Game strongly support iwi / hapu satisfaction with the PF2050 projects.

2.11 *Set of goals as a whole.* There is a concern that many of these goals are focused on outsourcing predator control and fund gathering to external sources (private, public, community sources), or the hope of acquiring tools and technology in the future. Without oversight there will be varying levels of achievement gained from these efforts, potentially leading to disenfranchisement of the general population, and an increasing number believing predator control is unachievable. There are also a subsection of goals here which could more accurately be defined as aspirations, as they do not have specific and measurable steps to achieve the desired outcome. These aspirations are noble but risky, as the ability to achieve them lies in circumstances beyond direct control. As such, they could be reworded, designated as aspirations, or removed from this goal list.

3.0 Participation in predator free work

- 3.1 Fish and Game support predator removal work via education and assistance to our licence holders. Education materials are found online, and on phoning or coming into the regional offices. This work is supported in wetlands, farms, and to support both game bird and indigenous bird species. Examples of online education material can be found here: <https://www.fishandgame.org.nz/environment/protect-nz-game-bird-habitats/wetland-educational-programme/basic-tips-for-predator-control> and here <https://www.fishandgame.org.nz/game-bird-hunting-in-new-zealand/hunters-for-the-environment/predator-control-doc-traps/> .
- 3.2 In terms of Fish and Games predator control education, it would be supportive to have communication with the predator control updates, particularly in the case of any new tools or technologies being developed. Fish and Game are always invested in working collaboratively with the Department of Conservation and other teams to support positive biodiversity outcomes for Aotearoa New Zealand.

4.0 National target species list proposal

- 4.1 *Thoughts on the proposed approach to retain current National Target Species List?*
Fish and Game supports retaining the current target species list. A common thread in the discussion document was the concern that eradication of the current national target species by 2050 may not be feasible. Adding additional target species to this list therefore could render the goals less achievable and potentially push the entire project into jeopardy. It may be best to stay focussed on the species on the list, and once it is known if pest eradication is viable, then add new species to the list of targets in ethical, systematic, and scientific ways.
- 4.2 *Alternative approaches to National Target Species List?*
An alternative could be to target fewer species than are currently listed and focus on gathering data to analyse the ecological impacts of species removals. Removals of predator species may cause trophic cascades and significantly deleterious ecological impacts. Predator suppression to a low level should also be assessed for cost, effect, and viability.
- 4.3 *Benefits of not including feral cats at this time?*
There are concerns that the eradication of the species currently targeted may not be feasible. Not adding further species to the list, therefore, seems to be prudent and cost/energy efficient. There is also a public perception conundrum regarding the elimination of cats: more people are aware of the difference between pet cats and feral cats; however, many people love their pet cats and are distressed at the thought of killing cats and have concerns regarding how

eradication efforts will be able to solely target feral cats. As many cats have the capacity to become feral should the circumstances allow, eradicating feral cats is likely unachievable until such time as people have effective, affordable, and allowed (in the case of renting) tools and technology to keep cats within their property boundaries.

F&G also notes that feral cats can be predate on game birds and their young and therefore some of our licence holders implement feral cat control operations.

- 4.4 *Risks of not including feral cats at this time?* If mustelids and rats are eradicated from areas, feral cats may be more likely to target bird species. However, if the removal of mustelids and rats causes an increase in mouse populations, this may not eventuate.

5.0 Conclusion

- 5.1 The main stated aim of the PF2050 discussion document is to have evidence that achieving a predator free 2050 is possible and that we know how to do it. It is somewhat concerning that at this stage in the process, it is still unknown whether the priority goal can be achieved.
- 5.2 Another stated goal was to continue essential predator control to create safe spaces for native species and improve biodiversity outcomes. It should be noted that essential control only is unlikely to expand the PF ranges or zones and may only result in a holding or maintenance pattern. It is particularly important that the currently predator-free offshore islands remain predator-free.
- 5.3 Another stated aspiration was to innovate for eradication by advancing tools and techniques to eradicate predators in rural, urban, and conservation areas. Does this aspiration aim to eradicate predators in each of these biomes, or nationally? The discussion document was unclear on this. However, it was admitted that achieving PF2050 is beyond current capacity and capability, and this is why there is a need for a toolbox of techniques that work in and across different landscapes.
- 5.4 Given this range of aspirations, goals, and general acknowledgement that eradication (even in smaller scales) of the targeted species is beyond current capacity and may remain so for an unforeseeable time, urgently expanding the research to explore suppression options and outcomes may be required.
- 5.5 Fish and Game supports predator control tools, techniques, and teachings, and will continue to educate and promote these to our license holders and the public. We look forward to further future communications and hope these can be more frequent than a five yearly goal check in process via a public consultation process.

Attachment 1 – About Fish and Game

About Fish and Game

- 1.1 Fish and Game is the statutory manager for sports fish and game, with functions conveyed under the Conservation Act 1987. The organisation is an affiliation of 12 regional Councils and one national Council. Together, these organisations represent approx. 130,000 anglers and hunters.
- 1.2 The sports fish and game resource managed by Fish and Game are defined and protected under the Conservation Act and the Wildlife Act 1953. The species within include introduced sports fish and a mix of native and introduced waterfowl and upland game¹.
- 1.3 Our vision, purpose and values are illustrated below:

OUR VISION Our vision is a New Zealand where freshwater habitats and species flourish, where hunting and fishing traditions thrive and all Kiwis enjoy access to sustainable wild fish and game resources.	OUR PURPOSE Fish & Game New Zealand maintains and enhances sports fish and game birds, and their habitats, ensuring access for current and future generations of New Zealanders.	OUR VALUES TRUST INCLUSION CONNECTION SERVICE
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- 1.4 Fish and Game is entirely funded by licence holder fees and private contributions, meaning the delegated function of managing the species for the public good is funded entirely by the users. It is a democratic '*user pays, user say*'s organisation. Using this system, Fish and Game funds public good research to ensure fisheries and game populations are managed sustainably; undertakes compliance with the licencing system; and contributes to public planning processes to ensure that hunters and anglers values are recognised and provided for.
- 1.5 In relation to planning, Fish & Game have the statutory function to advocate for hunters and anglers values and ensure that the habitats of gamebirds and sports fish are provided for. At any one time we may have around 150,000 licence holders, and a larger number (approximately 300,000) that are transient licence holders. The habitat we specifically advocate for includes lakes and rivers that contain trout and salmon (and other sports fish) and wetlands where game bird hunting occurs.

¹ Most New Zealanders refer to these species as 'game birds', distinguishing them from other types of large game, such as deer or pigs. The Wildlife Act 1953 defines these birds simply as 'game' and this phrase is used in the context of this submission.

Fish and Game in Resource Management

- 2.1 Fish and Game works to provide for the ongoing enjoyment of hunting and freshwater fishing assets, the maintenance (or enhancement) of public access to rivers, lakes, and wetlands for hunting and fishing, and the protection of the habitat of trout and salmon.
- 2.2 Hunting and angling require legal and physical access both to habitats and the resource itself. Maintenance and enhancement of access is critically important to the pursuits of our licence holders. The maintenance and enhancement of public access to and along lakes and rivers is listed in the RMA 1991 as a matter of national importance.
- 2.3 We see the opportunity for proposals to be required to provide improved access both to their sites and other nearby areas that involve hunting or fishing values as a form of mitigation for any loss of values on site. We seek that Fish and Game are consulted as an expert advisor where gamebird and or sports fishery values could be impacted. We can work with government officials to ensure outcomes that achieve both economic imperatives, along with recognising and providing for hunting and fishing values.
- 2.4 We specifically seek the protection of:
 - i. habitat of trout and salmon.
 - ii. maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers where sports fishing and game bird values exist.
 - iii. preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, lakes and rivers and their margins where sports fishing and game bird values exist.
 - iv. Recognition and provision for freshwater angling/game bird hunting and amenity values.



What does Fish & Game do?

Who are we? Fish & Game New Zealand manages, maintains and enhances sports fish and game birds and their freshwater habitats in the best long-term interests of anglers, hunters and all New Zealanders.

Our vision

A New Zealand where freshwater habitats and species flourish, where game bird hunting and fishing traditions thrive and all New Zealanders enjoy access to sustainable wild fish and game resources.

Together, let's ensure a thriving future for fishing and game bird hunting!

What we do

- Manage fishing and hunting regulations
- Conduct research to monitor fish and game bird populations
- Collaborate with communities to protect natural habitats
- Provide educational programmes and resources
- Advocate for valued habitats and species
- Negotiate and maintain access for anglers, hunters and all New Zealanders

fishandgame.org.nz

#ReWild



What does Fish & Game do?

Species management: We monitor and survey species populations; set season regulations; and sustainably manage pressure on the resource.

Habitat protection: Advocate and take action to protect and enhance lakes, rivers, streams and wetlands; and secure 'national park' status to important rivers through Water Conservation Orders.



Access and participation: Negotiate and advocate so all New Zealanders can access our natural places; maintain access signage, information and brochures; organise fishing and hunting events and classes.

Public awareness: Maintain public advocacy; schools programmes; website and newsletters; community liaison; promote the right of licensed anglers and game bird hunters to pursue their chosen pastime.

Compliance: Recruit, train, equip and coordinate warranted rangers, to educate and enforce regulations to ensure the fish and game resource is sustained.

Licensing: Provide a nationwide licensing system with a range of licence categories and sales channels that makes it easy to buy a licence. We are solely funded by licence holders.



Council: Hold public meetings of elected licence holders to approve regulations and budgets, set policies and provide governance for the Fish & Game system.

Coordination and planning: Provide research, planning and reporting; financial management and general coordination across Fish & Game New Zealand.

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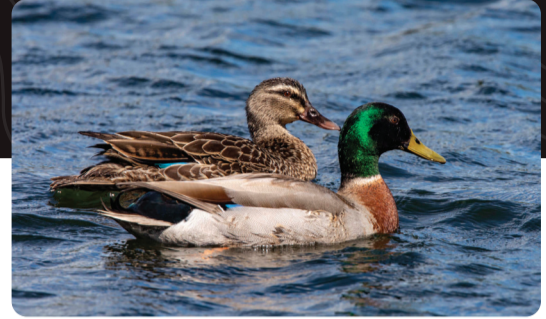
Species we manage



Black Swan Kakianau



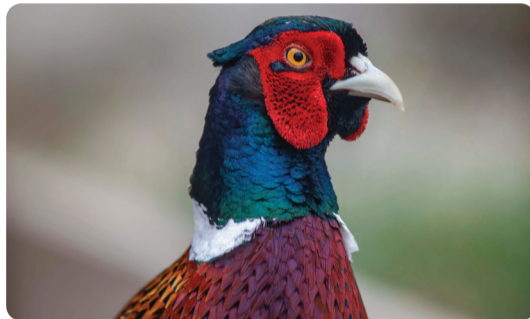
Californiaian Quail Koitareke



Mallard Rakiraki



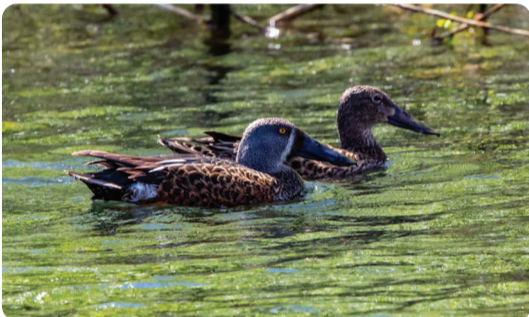
Paradise Shelduck Pūtakitaki



Pheasant Peihana



Pūkeko



Shoveler Kuruwhengi



Chukar



Grey Duck Pārera



Brown Trout



Rainbow Trout



Chinook Salmon



Sockeye Salmon



Brook Trout



Tiger Trout



Perch



Tench