



Hamilton City Council – Staff Submission

**Predator Free 2050 – Strategy
Review Discussion Document
(May 2025)**

Department of Conservation

30 June 2025



**Hamilton
City Council**
Te kaunihera o Kirikiriroa

Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- **A city that's easy to live in**
- **A city where our people thrive**
- **A central city where our people love to be**
- **A fun city with lots to do**
- **A green city**

The topic of this staff submission is aligned with all of Hamilton City Council's five priorities.

Council Approval and Reference

This staff submission was approved by Hamilton City Council's Chief Executive on 30 June 2025.

Submission # 807

It should be noted that the following submission is from staff at Hamilton City Council and does not, therefore, necessarily represent the views of the Council itself.

Introduction

1. Hamilton City Council staff welcome the opportunity to make a submission to the Department of Conservation on its **Predator Free 2050 – Strategy Review Discussion Document (May 2025)**.
2. This submission includes comments on all four actions, the target species, and the goals as a whole.

Key Messages and Recommendations

3. We broadly support the goals of the Strategy.
4. We would like to acknowledge that Predator Free 2050 has succeeded in garnering public support for predator control and increased tools available for predator control and monitoring.
5. The focus of predator control across the country should be on a long-term increase in native biodiversity protection.
6. Cats, mice, and hedgehogs should be included at a lesser level in the strategy for control and not eradication.
7. A Department of Conservation strategy is needed for control of non-native browsers to benefit native biodiversity.

Proposed Predator Free Goal: Mobilise for Action

8. We strongly support the goal to increase community participation. As part of **Hamilton City Council's Nature in the City Strategy** ([refer here](#)), we aim to help support mana whenua, communities, and individuals to practise kaitiakitanga and care for the environment. Having the Department of Conservation support in this will lead to better outcomes. Active support is essential for community groups to succeed.
9. Predator-free hubs and umbrella organisations have proven effective in reducing administrative burdens, coordinating resources, and providing training. While Hamilton City Council offers direction to community groups, community hubs are often better positioned to provide hands-on support where direct local government assistance isn't feasible.
10. Community groups often face challenges using tools such as TrapNZ. Regional hubs and dedicated activator roles have helped bridge knowledge gaps and improve predator control efforts. Funding these hubs through the DoC would further empower community groups.
11. Communities need to understand the biodiversity benefits of predator control. A meta-analysis of regional and local monitoring (using tools like TrapNZ) would highlight the positive impacts of community efforts and serve as a motivator.
12. We believe there is a gap in standard practices and training for community and contractors in predator control. This includes a lack of standards for feral cat control. National rules and increased training will improve biodiversity outcomes.

13. We strongly support enabling iwi and hapuu leaders in predator control leadership and decision-making. Hamilton City Council recognises Maaori as kaitiaki (guardians) of the natural and physical environment as part of our city's strategy **He Pou Manawa Ora – Pillars of Wellbeing** ([refer here](#)).
14. This is a strategy which outlines Hamilton City Council's vision for a city that celebrates its special Maaori heritage, rich history, natural environmental wonders and ensures everyone has a voice in developing its future.

Proposed Predator Free Goal: Maintain the Gains

15. We support maintaining predator control in areas currently managed for long-term success. Short-term funding shifts can jeopardise long-term outcomes. It is better to build on successful projects.
16. We suggest better linking goals one and two. Community action may not always align with highly threatened species, but has indirect benefits like raising awareness of predator Impacts.
17. We believe the strategy needs to recognise that highly mobile fauna need protection across large areas, beyond jurisdictional or island boundaries. Consider connections between key sites to reduce limiting a species' dispersal or home range.

Proposed Predator Free Goal: Innovate for Eradication

18. We support a goal of improving predator control in urban areas but question the benefit of complete eradication versus suppression control for the same cost and for broader biodiversity gains. Focus on biodiversity benefits, not eradication, especially for hard-to-eradicate species such as rats.
19. We support the goal of Maatauranga Maaori contributing to eradication outcomes. Multiple approaches are valuable due to the interconnected nature of predators, biodiversity, and Te Ao. This can lead to a holistic, more encompassing approach.
20. We strongly support the expansion of the eradication toolbox and seeking multiple solutions.
21. As an urban centre, we wish to highlight the need for species-specific tools in relation to providing the confidence that predator programmes can avoid killing non-target species. Part of our decision-making process for the use of predator control tools within the city is the probability that a tool may kill residents' pets. More certainty increases acceptability in an urban environment.
22. We believe more work is needed to improve community understanding and acceptance of toxins for predator control. Better understanding can foster innovation as researchers are more likely to explore novel approaches without a public acceptance barrier.

Proposed Predator Free Goal: Prepare to Accelerate

23. We support the goal to increase non-governmental funding if it is not used to reduce funding to governmental agencies. Highlighting the impact of predator control methods on native biodiversity can give funders confidence in their positive contribution.

National Target Species

24. We support retaining the current national target species for eradication in the five-year strategy. We recommend including mice, cats and hedgehogs as species for control, not eradication.

25. Include non-eradication species in the innovation for eradication action. This can help address the lack of tools for targeting these species, noted as a limitation for the eradication. Including cats and hedgehogs in the overarching action to mobilise for action can increase public awareness, highlighted as an issue in the target species report. Increasing public awareness of these predators' aid control efforts. Educating cat owners on feral cats helps promote local cat management.
26. We believe a step towards control of feral cats would be a national plan or Act for responsible pet ownership, including desexing and microchipping.

Sets of Goals as a Whole

27. We believe predator control should focus on native biodiversity gains. Eradication may only be feasible locally for some of the target species. Research has shown that suppression to a base level has positive biodiversity outcomes and costs less. *"When the goal of biodiversity policy is predator eradication, rather than biodiversity protection, resources may be diverted from more substantial threats and better, multifaceted biodiversity recovery strategies"* (Linklater and Steer, 2018). We believe funding should target a mix of broader low-intensity suppression projects and some intensive control projects to achieve the highest biodiversity gains.
28. We believe that while Predator Free 2050 focuses on predators, there needs to be recognition and funding for controlling non-native browsers. Browsers harm native biodiversity over extensive areas by removing habitat and reducing plant populations, affecting food for native fauna and highly threatened species. *"Adopt a systems approach to management that addresses a wider range of biodiversity threats, rather than emphasising management of one threat to the exclusion of others"* (Leathwick and Byrom, 2023).

References

- Linklater and Steer 2018, Predator Free 2050: A flawed conservation policy displaces higher priorities and better, evidence-based alternatives.
- Leathwick and Byrom 2023, The rise and rise of predator control: a panacea, or a distraction from conservation goals?

Further Information and Opportunity to Discuss our Submission

29. Should the Department of Conservation require clarification of the submission from Hamilton City Council staff, or additional information, please contact **Maria Barrie** (Parks and Recreation Unit Director) on **021 775 629**, or email Maria.Barrie@hcc.govt.nz in the first instance.
30. Hamilton City Council representatives would welcome the opportunity to discuss the content of this submission in more detail with the Department of Conservation.

Yours faithfully



Lance Vervoort
CHIEF EXECUTIVE

FURTHER INFORMATION

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