International Organization for Animal Protection

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Policy Brief

Title: New Zealand Predator Free 2050: Concerns Regarding Animal Welfare, Child Rights and Humane Alternatives in Feral Cat Management
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1. EXECUTIVE SUMMARY

New Zealand's decision to include feral cats in the **Predator Free 2050 Strategy** significantly expands its predator eradication programme. While protecting native biodiversity is an important goal, the current approach relies heavily on lethal control methods such as trapping, poisoning, and shooting, including through community-led initiatives. It gives limited attention to humane non-lethal alternatives or robust impact assessments. This raises a number of concerns relating to animal welfare, child protection, scientific effectiveness, and alignment with international obligations, including those under the UN Convention on the Rights of the Child (UNCROC). In particular, the involvement of communities (including children) in animal culling activities may raise concerns regarding exposure to violence and its potential psychosocial impacts.. It also appears inconsistent with domestic animal welfare principles and expert recommendations that cats, as sentient beings, should be managed using the most humane available methods.

Available evidence suggests that large-scale culling of feral cats in open mainland environments may have limited long-term effectiveness, while gaps remain in data, safeguards, and impact assessment processes. At the same time, there is increasing international recognition of the need to prioritise humane and sustainable approaches to animal population management.

Key concerns
The current policy:

- Risks potential exposure of children to violence and absence of dedicated child rights impact assessment, and conflicts with NZ child protection and UNCROC obligations
- Lacks consistent and enforceable humane standards
- Limited to no evidence of large-scale culling in mainland contexts achieving permanent eradication
- Insufficient evaluation of humane, science-based alternatives
- Lacks robust ecological and social impact assessments;
- Gives insufficient consideration to humane, science-based, non-lethal alternatives;

Summary of Recommendations
We recommend that the Government:

- Consider a precautionary moratorium on feral cat culling and child-involved activities;
- Review the inclusion of feral cats in Predator Free 2050;
- Undertake children's rights, environmental, and welfare impact assessments;
- Evaluate humane, science-based alternatives (including TNVR and fertility control);
- Consult a broad range of stakeholders;
- Promote evidence-based and humane public education approaches

2. CONTEXT

2.1 Policy Background

Predator Free 2050 is a New Zealand government conservation strategy launched in 2016 and aiming to eradicate key introduced predators, using lethal control methods, by 2050 to protect native wildlife and ecosystems. It is a nationwide, long-term programme led by Predator Free New Zealand Trust (PFNZ). PFNZ is not a direct government department or a Crown ministry and this has potential to limit regulatory oversight, transparency and accountability. The formal inclusion of feral cats in the strategy did not happen until 2025, after limited transparent policy review or research.

The inclusion of feral cats is still evolving and contested, and has been influenced by public submissions, conservation pressure and policy reviews. It remains more complex and controversial than the original target species and key debates remain about debates about animal welfare, cats, ethics, methods, public messaging, and feasibility. The inclusion also overlooks key recommendations from the multi-stakeholder National Cat Management Group's report of June 2025 (the "NCMG Report").[1] The NCMG Report recommends that all legislation and plans to manage feral cats must:

- Recognise cats are sentient beings that must be protected from unnecessary pain or distress as legislated under the NZ Animal Welfare Act 1999;
- Be informed by science and ethics[2] to promote positive cat welfare and minimise harm;
- Determine the most humane approaches to feral cat management.[3]

2.2 Scope of Measures

The strategy relies primarily on eradication-based approaches, similar to other target species. These include lethal control, trapping (including kill traps), poisoning (bait stations, toxins), shooting, hunting, and emerging technologies (e.g. automated toxin delivery).

The full scope of measures for feral cat control is comprehensive and aims at large-scale, long-term population elimination, not just local control. Measures are expected to operate across public conservation land, in rural and remote communities, and through community led initiatives and actions.

The specific inclusion of cats in the strategy allows for easier access to funding for local projects and an expansion of community led programmes which is of particular concern. Lethal animal control methods may require stronger oversight and professional implementation.

Predator Free 2050 messaging is routinely rolled out via education programmes that risk demonising certain animals, do not routinely encourage respect for all animals as sentient beings, and can encourage inhumane killing methods.[4]

To date there is very limited detail on any specific humane standards and how they will be enforced, assessment and consideration of non-lethal alternatives, or comprehensive impact assessment methodologies or frameworks. There are an estimated 2.5 million feral cats in New Zealand.

3. KEY CONCERNS

The inclusion of feral cats within the Predator Free 2050 extends an eradication model to a species with significant welfare, ethical, and social implications, relying heavily on lethal control methods, including trapping, poisoning, and shooting, implemented at a national scale with potential involvement of communities and children. This approach prioritises large-scale killing despite well-documented limitations in long-term effectiveness and raises serious concerns regarding animal welfare, normalisation of violence, and exposure of children to harm. The current policy framework shows insufficient consideration of humane, evidence-based alternatives and lacks clear evidence of robust environmental and children's rights impact assessments, placing it at risk of misalignment with both scientific best practice and New Zealand's international legal obligations. We believe that this lack of comprehensive pre-impact assessment, research into effectiveness and methods, and evidence-based research alone should prompt an immediate moratorium on feral cat culling at the very least.

3.1 Animal Welfare Concerns:

- Risk of unnecessary suffering and cruelty
- Lack of explicit and consistent humane standards
- Contrary to recommendations of NCPMG
- Contravenes NZ animal welfare laws
- Lack of control over delivery methods, especially by devolving responsibility to unregulated community groups, forums and citizens.
- Impossible in many instances to identify feral cats as separate from stray community cats or domestic pet cats.

The NZ SPCA response to the Predator Free Strategy review[5] highlights the specific concern that "animals targeted in Predator Free 2050 are vulnerable to welfare harm due to categorisation as pests. Categorising animals as pests can objectify them and lead to the justification for inhumane treatment. A humane approach to pest management recognises that regardless of their perceived nuisance, animals considered pests are sentient beings that can experience negative states of welfare". [6] The SPCA also advocates for improved funding into research on humane population control measures. The widespread use of poisons and toxins as a control method is inhumane and also dangerous to other animals, humans and eco-systems.

3.2 Child Rights Concerns

- Exposure to violence against animals can cause long term psychological and developmental harm to children and contravenes international and domestic legislation to protect children.
- Demonization, labelling of certain species only as pests rather than sentient animals, and lethal killing of certain animals leads to the erosion of compassion and empathy longer term.
- There are clear links between early exposure to and involvement in violence against animals and later violence towards humans and anti-social behaviour.
- Absence of a dedicated child rights impact assessment

The eradication policy allows unregulated community involvement, including children in the culling of feral cats, and other species. The actual exposure of children to such disturbing cruelty in New Zealand is already well documented.[7]

The annual culling competition in Canterbury, detailed in Annex 1, encourages children to be involved in hunting and killing mammals including cats. There is also evidence of children being taught in schools to participate directly in the killing of animals in the name of 'conservation', with teachers posing questions such as "*which are the animals you want to kill the most*"[8]. The SPCA notes specifically that "school fundraising events that promote the trapping, hunting, and killing of cats by children and young people may not routinely include recommendations to ensure child wellbeing or identify the possible psycho-social impacts on child participants"[5]. Despite these risks, it appears that the Government may not have conducted a children's rights impact assessment prior to including feral cats within the Predator Free 2050 Strategy.[9]

Violence does not begin in adulthood. A substantial body of international and New Zealand research demonstrates links between exposure to deliberate and normalized harm to animals and increased aggressive behaviour towards animals and other humans, desensitisation to suffering, links to domestic violence, and 'empathy erosion'. [10] [11] [12] [13]

3.3 Ethical and Social Implications

- Normalisation of violence if framed as morally acceptable
- Public perception that animal cruelty is acceptable normalises violence and reduces empathy.

Labelling cats as 'feral' or 'pests' reduces empathy and concern for their welfare. This is particularly troubling given the difficulty, in practice, of distinguishing feral cats from stray or frightened domestic cats. This arbitrary, denigrating classification of animals foments and normalises the types of violent

unethical behaviour, like feral cat killing competitions, to which children and whole communities are being exposed.[14]

The NCMG's Report confirms that "*non-lethal control methods for feral cats are preferred over lethal control methods by the public*".[15] This public preference for non-lethal control methods is consistent with the 90% public support[16] for "*improved feral cat management*" cited by the Government as a justification for including feral cats in the Predator Free 2050 Strategy.

3.4 Policy and Scientific Gaps

- Lack of data on successful eradication approaches elsewhere
- Limited assessment of humane alternatives
- Limited impact and risk assessments

The NCMG Report and the NZ SPCA submission to the Predator Free Strategy Review both highlight the lack of reliable data informing the current feral cat culling proposals. Specifically there is a lack of reliable data on the number of owned, stray, and feral cats, the full impact of lethal and non-lethal methods currently used, and unanswered questions about sustainability, efficacy, ethical concerns, and the broader ecological impacts of their removal on other wildlife and biodiversity.[5] In circumstances where the environmental impacts and outcomes remain uncertain, international environmental law requires application of a 'precautionary approach'.

Critics argue that the eradication of feral cats is not only likely to be unachievable, but also neglects scientific research into potential negative outcomes and alternative methodologies. [17] [18] [19] There is a widespread lack of high-quality research into alternative approaches and monitoring of current culling strategies. More simple control of predators, alongside habitat protection, restoration, and refuges for threatened species can better support threatened biodiversity. A "high profile" focus on predator eradication can divert attention and resources from better alternatives."[18] The ethics of using any animal culling as a method of conservation is also hotly debated, especially where it is not based on clear evidence of effectiveness or impact. [20] [21] Research into non-lethal control methods should be prioritized. The Predator Free Strategy is also criticised as being led by socio-political pressure, rather than necessary changes to conservation goals, leadership, responsibilities and accountability, and strengthened science expertise in conservation policy "[19]

4. EVIDENCE AND ANALYSIS

A commitment to minimising harm and determining the most humane (i.e., non-lethal) approaches to feral cat management is consistent with international humane cat population management guidance, which discourages mass culling as both unethical and ineffective. Guidance from the International Companion Animal Management Coalition specifically states that "*Although lethal methods can cause rapid depopulation, they are rarely effective in the long term in mainland areas.*[22] It is essential that any programme is comprehensive and focused on root causes of feral cat populations, and not solely on treating the symptoms. Data supports the success of TNVR in reducing cat populations, but suggests that to have a large impact it would have to be adopted on a far greater scale than is currently practised[23].

There are some well-documented international examples of feral cat eradication programmes using lethal control. However, these are **exclusively found across islands or enclosed geographical areas with limited reinvasion risk,** and where programmes are highly targeted and monitored long term.[24] Island cat eradication examples are often used to justify lethal approaches, but they are not directly transferable to mainland countries or very large islands, populated areas or rural communities. Feral cats have reportedly been successfully eradicated from at least 48 islands, but 75% of these islands are less than 5 km^2 in size with much more limited success reported on islands over 10km^2.[25]

Contrary to the island examples, there are studies showing that culling is more likely to be ineffective for long-term population control in open ecosystems, with international examples favouring humane alternatives. Mass culling of cats without systemic long-term (forever) control can simply create space for other cat colonies to expand into, and have little or no long-term effect on population numbers[26]. One study into the effectiveness of feral cat culling in Australia found that the abundance and activity of feral cats in the cull studied actually increased over time, due to this type of "compensatory immigration" as dominant cats were removed and new cat colonies took over.[27]

The researchers in this and other studies highlight the need for multi-faceted, strategic and systematic approaches to predator control, because lethal control of one species can have unintended negative consequences on other ecosystems and species.[28] [17] [19]There is evidence for example, that reducing feral cat populations can have an unintended but deleterious effect on threatened species, because middle level predators like rats can thrive as cat populations decline. Annexe 2 describes 3 case study examples, from Marion Island, Stewart Island and Macquarie Island.

5. LEGAL AND POLICY FRAMEWORK

5.1 International Frameworks

New Zealand is a signatory to the United Nations Convention on the Rights of the Child (UNCROC), requiring protection of children from all forms of physical or mental violence. More specifically, Article 19 requires that "*States Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence*". General Comment 26 (2023) interprets "*all forms of physical or mental violence*" as including "*exposure to violence…inflicted on animals*."[29] Actively involving communities including children in the hunting and killing of any animal contravenes this obligation.

Under the Convention for Biodiversity Article 14 letter A, members are required to undertake appropriate environmental impact assessments for any activities likely to have significant effects on biodiversity, taking into account ecological, ethical and societal considerations[30].

5.2 National Framework (New Zealand)

Article 4 of the UNCROC obliges States Parties to "*undertake all appropriate legislative, administrative, and other measures for the implementation of the rights recognized in the present Convention*". In keeping with this obligation, Section 5(1)(b) of the Children's and Young People's Well-Being Act 1989 recognises that "*the well-being of a child or young person must be at the centre of decision making that affects that child or young person, and, in particular (i) the child's or young person's rights (including those rights set out* ***in UNCROC*** *and the United Nations Convention on the Rights of Persons with Disabilities) must be respected and upheld, and the child or young person must be…protected from harm*".

- International: UNCROC (Articles 3 and 19; General Comment 26), Convention on Biological Diversity Article 14 (environmental impact assessments).
- National: Animal Welfare Act 1999,
- Predator Free Strategy 2050.

5.3 Best Practice and International Guidance

A commitment to minimising harm and determining the most humane (i.e., non-lethal) approaches to feral cat management is consistent with international humane cat population management guidance, which discourages culling as both unethical and ineffective.[22]

Best practice will involve an assessment of alternative humane, evidence-based cat management strategies and stakeholder collaboration [31] with reference to experts in the field and in line with international guidance, the World Organisation for Animal Health's requirements, and ICAM's cat management guidance. This guidance states that "*Lethal methods of population control aim to eradicate*

or significantly decrease cat populations through culling…are ethically questionable…hence alternatives should be pursued in preference…Although lethal methods can cause rapid depopulation, they are rarely effective in the long term in mainland areas. As long as food is available cats will potentially establish themselves in the empty niche…Also, with almost any control method or combination of methods a few breeding cats are left and they repopulate the area" (p32). [22]Culling as a method of control is also typically unsustainable without continuous killing, whereas TNVR can lead to long-term population decline and stabilisation over time**.** [32] A very simple comparison of humane TNVR methods for feral population control versus lethal eradication methods in non-island environments clearly shows that the former is both more humane and more effective long term (Annex 3).

Alternatives analysis should explore humane and science-based approaches to cat population management, including:

- Trap, relocate programmes
- Trap-Neuter-Return (TNR / TNVR)
- Fertility control and non-surgical contraception
- Targeted management in ecologically sensitive wildlife areas
- Protected or managed ecosystem zones
- Barrier and exclusion methods
- Identification of thresholds of cat activity compatible with biodiversity protection
- Measures to promote responsible pet ownership
- Improved control of sources of cat population growth (e.g. abandonment, breeding)
- Community-based programmes integrating biodiversity protection and humane management.

There is currently limited evidence that mass feral cat culling will lead to successful eradication, or achieve the aim of protecting vulnerable species. It remains naïve to think that any one approach will fit every situation, but it is clear that alterative humane and non-lethal methods of cat control do exist, and need to be developed.

6. RECOMMENDATIONS

In the light of the above concerns, we respectfully request that the Government:

1. Consider imposing an immediate moratorium on feral cat culling; and any education or community based "activities" that involve or encourage children to kill any animals
2. Conduct the following assessments:
   a) a children's rights impact assessment;[33]
   b) an environmental impact assessment examining wildlife protection, cat population numbers and dynamics, and the ecological impacts of removing feral cats. [34]
   c) an assessment of alternative humane cat management strategies,
   with reference to experts in the field. This alternatives analysis should explore humane and science-based approaches to cat population management, including fertility control, targeted management in sensitive wildlife areas, what thresholds of cat activity can allow the persistence of cat-susceptible species, and community-based programmes that address both biodiversity protection and feral cat welfare.
3. Identify and consult with a broad range of stakeholders, including animal welfare organisations, environmental experts, and child-development specialists;[35]
4. Implement a public education campaign.[36]

7. CONCLUSION

The inclusion of feral cats in the Predator Free 2050 Strategy represents a significant policy development. While biodiversity protection remains a critical objective, the current approach raises concerns relating to animal welfare, child protection, scientific effectiveness, and alignment with international obligations. There is limited evidence that widespread culling will deliver lasting ecological benefits in an open mainland environment, while credible concerns remain about normalising violence, harming children's wellbeing, and causing unnecessary suffering to sentient animals.

Given the existing uncertainties and potential risks, a more precautionary and evidence-based approach may be warranted. Strengthening the consideration of humane alternatives, impact assessments, and safeguards would support a more balanced, sustainable, and legally compliant policy framework.

8. CONTACT DETAILS

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ANNEXES

Annex 1 – Documented examples of children's involvement in cat culling

North Canterbury feral cat (and other predators) culling competition

The North Canterbury Hunting Competition is an annual high-profile example of community-led predator control involving children, evolving from a controversial 2023 proposal (partly cancelled) into a fully active and widely criticised event by 2024, with hundreds of animals killed and significant youth participation. It remains a focal point in debates about conservation, animal welfare, and children's exposure to violence. It traditionally targets animals such as deer, pigs, possums, rabbits, and ducks, but in 2023 a feral cat category was introduced, significantly increasing controversy.

- The event is community-based and open to both adults and children. In April 2023, organisers introduced a category where children under 14 were encouraged to kill feral cats for cash prizes. A prize (around NZ$250) was offered for the child who killed the most cats. Reports describe children taking active part directly in hunting and killing activities, wearing themed costumes (e.g. "Animal Slay Movement") at the event, throwing rocks at protesters during confrontations, and being filmed handling dead animals (e.g. dragging carcasses).
- It is framed by organisers as pest control and conservation, while also raising funds for local schools and community projects.
- The announcement triggered strong backlash from animal welfare groups and the public, citing risks to pets and concerns about children using weapons.

While the children's cat-killing category was cancelled shortly after in 2023 due to backlash and safety concerns, the active involvement of children and young people continues annually. By 2024, feral cats were again included in the competition, and an estimated 340–400 cats were killed during the event. The competition had over 1,500 participants, including approximately 440 children under 14. While detailed 2025 reporting is more limited, available coverage indicates that the competition continues annually with ongoing controversy**.** It remains community-based, includes youth participation, and retains a competitive hunting structure**.**

Key themes from media coverage:

Across 2023–2025 reporting, several consistent concerns are highlighted:

- Child involvement: children directly participating in killing animals for prizes
- Desensitisation concerns: critics argue it may "desensitise children to violence"
- Animal welfare risks: potential for prolonged suffering and mistaken killing of domestic pets
- Public controversy: repeated protests and international media attention
- Rural vs urban divide: organisers defend the event as normal rural practice

https://www.thetimes.com/world/australasia/article/cat-killing-competition-leaves-400-hundred-animals-dead-q76f2jf3t
https://www.rnz.co.nz/news/national/521001/nearly-400-cats-killed-in-controversial-competition
https://www.theguardian.com/world/article/2024/jul/02/new-zealand-feral-cat-killing-competition
https://www.bbc.com/news/world-asia-65320162
https://www.theguardian.com/world/2023/jun/28/chaos-at-new-zealand-feral-cat-hunting-contest-as-video-of-children-chanting-with-dead-animals-emerges

https://cbsaustin.com/news/nation-world/cat-killing-competition-for-kids-in-new-zealand-canceled-after-backlash-north-canterbury-hunting-competition-feline-feral
https://www.theguardian.com/world/2023/apr/18/new-zealand-feral-cat-hunting-competition-for-children-prompts-backlash

Visual evidence from the North Canterbury Hunt


HUNTING
CATS


CREW


HUNTING
CATS

Annex 2
International examples

Marion Island

The complexity behind success is illustrated in a review of the cat eradication programme on Marion Island (290 km^2) in the sub-Antarctic Indian Ocean. Although ultimately successful, it took 19 years of sustained action to eradicate a relatively low-density cat population, and relied on a complex array of measures including biological control by introducing feline pan-leukopenia virus, trapping, hunting and poisoning.[37] Not only are these methods inhumane and unsafe, it is also hard to see how this success could be replicated on such a large scale as the entirety of New Zealand.

Stewart Island

One study on Stewart Island of feral cat faeces found rat remains in 93% of cat faeces, but in Kakapo (an endangered bird) bird remains in only 5.1 % of cat faeces samples. Eradicating cats in this instance would likely allow a fast rebound of the rat population of equal or more danger to the Kakapo as a predator[38]. Another modelling study demonstrates how a controlled cat population can have a protective effect on endangered birds. Eliminating the top predator - the feral cats – in the model, rather than just controlling their numbers, allows uncontrolled rat populations to thrive, resulting in more damage to the native ecosystem, and near total loss of bird populations[39]. This reinforces the need for much more detailed and scientific impact assessment of this whole policy.

Macquarie Island

A well-meaning attempt to eradicate cats from the sub-Antarctic Macquarie island resulted in rapid and unforeseen changes to the island ecosystem and biodiversity. The cat eradication programme was started in 1985 and expanded in 1998, to protect endangered seabirds. The last cat was eradicated in 2000, after significant per cat costs over many years. 220 cats per year was the highest reported kill rate achieved in this time. Eradication efforts had previously failed to completely clear the island of rabbits, which were the main prey of cats on the island. Within 5 years of cat eradication, rabbit number had rebounded significantly, wiping out 40 years of efforts art rabbit control in just 6 years, This resulted in widespread ecological damage. Increased rabbit herbivory caused substantial damage and changed the landscape from complex vegetation to short grazed grassland. This consequently led to the disappearance of established bird nesting areas, widespread erosion, and land degradation. Rabbit tunnelling also destroyed petrel burrows, exposing them to successful skua attacks and deaths. The authors of the study describing these impacts state that despite the best intentions and a planned and integrated approach, cat eradication resulted in "rapid and detrimental changes to ecosystems, thus negating the direct benefits of the removal of the target species".[40]

Annex 3 Eradication vs Humane Management (TNVR)

Issue	Eradication (Culling)	Humane Management (TNVR)
Where it works best	Isolated islands, fenced reserves	Urban, peri-urban, mainland
Effectiveness (long-term)	✓ High in closed systems ❌ Often fails in open systems (rebound)	✓ Stabilises and reduces populations over time
Speed of impact	✓ Rapid short-term reduction	❌ Slower, gradual decline
Repopulation risk	❌ High ("vacuum effect")	✓ Low (sterilised cats hold territory)
Animal welfare	❌ High welfare concerns	✓ Considered humane best practice
Public acceptance	❌ Often controversial	✓ Generally high
Child exposure risk	❌ Direct (killing methods)	✓ Minimal
Cost over time	❌ Repeated cost (re-invasion)	✓ Cost-effective long-term

Annex 4
References – scientific evidence, studies and reports

[1] We understand that the NCMG consists of 7 national organisations that have an interest in cat management including: Local Government New Zealand, Predator Free New Zealand Trust; Veterinarians for Animal Welfare Aotearoa, Companion Animals New Zealand, New Zealand Veterinary Association, NZVA Companion Animal Veterinarians, and the Royal New Zealand Society for the Prevention of Cruelty to Animals. The Ministry for Primary Industries is an observatory member, and the Department of Conservation is a technical advisory member.

[2] Section 8.1 of the NCMG's Report recommends that "*an ethics framework is used to develop and implement cat management activities…based on the following questions:*

- *Can the problem be mitigated by changing human behaviour?*
- *Are the harms serious enough to warrant wildlife control?*
- *Is the desired outcome clear and achievable, and will it be monitored?*
- *Does the proposed method carry the least animal welfare cost and to the fewest animals?*
- *Have community values been considered alongside scientific, technical, and practical information?*
- *Is the control action part of a systematic, long-term management programme?*
- *Are the decisions warranted by the specifics of the situation rather than negative labels applied to the animals?*"

[3] Section 1.2.1.

[4] Palmer, A., & Birdsall, S. (2023). Predator free 2050 and pedagogy: Teaching about introduced predators in Aotearoa New Zealand. *The Journal of Environmental Education*, *54*(6), 355–370. https://doi.org/10.1080/00958964.2023.2254722

[5] https://www.spca.nz/downloads/pdf/assets/1307119/1/Predator+Free+2050+strategy+review+public+consultation+-+Department+of+Conservation.pdf

[6] Potts, A. (2009). Kiwis against possums: A critical analysis of anti-possum rhetoric in Aotearoa New Zealand. *Society and Animals, 17*(1), 1-20. https://doi.org/10.1163/156853009X393738

[7] https://networkforanimals.org/appeals/new-zealand-cat-hunt-june-2025/; see also here and here.

[8] https://www.youtube.com/watch?v=bp_wb2FgL94; see also here. Research indicates that such teaching is, sadly, not uncommon in New Zealand – see *Primary school education resources on conservation in New Zealand over-emphasise killing of non-native animals*, Michael C. Morris, Cambridge University Press, 16 December 2021 ("*The resources reviewed promote the view that non-native mammals should be killed. Some resources go further in giving instructions to children on how to do this, and how to source kill traps. Children are provided with material designed to engender dislike towards non-native mammals, particularly possums. Resources conflate issues of conservation by tying it in with protection of tourism, ornamental plants and primary industries. This encouragement of killing in environmental educational resources appears unique to New Zealand. It is discussed in light of increasing evidence that performing or witnessing animal abuse is a causal factor for future violence towards human and non-humans animals*" (emphasis added)).

[9] Contrary to paragraph 75 of General Comment 26 (2023), which expressly mandates that "*All proposed environment-related legislation, policies, projects, regulations, budgets and decisions, and those already in force, require vigorous children's rights impact assessments, in accordance with article 3(1) of the Convention.*"

[10] See, for example, Ascione, F.R. (2005). *Children and animals: Exploring the roots of kindness and cruelty. Purdue University Press* (evidencing strong associations between childhood exposure to animal harm and later interpersonal aggression, especially where the behaviour is modelled or socially reinforced); Bandura, A. (1999). *Moral disengagement in the perpetration of inhumanities.* Personality and Social Psychology Review, 3(3), 193–209 (showing that when harm is cognitively reframed as morally justified, for example as protecting biodiversity, children internalize mechanisms, like moral justification, euphemistic labelling, and diffusion of responsibility. These mechanisms reduce empathic inhibition and can also generalise beyond the immediate situation. Children's participation in 'morally justified' killing engages psychological processes that the research clearly establishes as high risk); Arluke, A., Levin, J., Luke, C., & Ascione, F. R. (1999). *The relationship of animal abuse to violence and other forms of antisocial behavior.* Journal of Interpersonal Violence, 14(9), 963–975 (showing that when children are encouraged, supervised, or even praised for participation in animal killings, that creates a reinforcement process. Developmentally, reinforcement is what ultimately leads to normalisation and the condoning of more extreme acts of violence); Plant, M., Van Schaik, P., Gullone, E., & Flynn, C. (2019). *"It's a dog's life": Culture, empathy, gender, and domestic violence predict animal abuse in adolescents—implications for societal health.* Journal of interpersonal violence, 34(10), 2110-2137 (demonstrating that repeated exposure to intentional harm, even when legally sanctioned, can contribute to desensitisation and reduced physiological responsiveness to suffering cues. Cultural and social normalisation of both violence against animals and violence against humans (e.g., domestic violence) are predictors of greater levels of violence perpetration by children as well as internalising problems such as suicidality and depression. Children have innately high levels of empathy ('biophilia'), which develop throughout childhood and adolescence. Direct participation in killing during these key periods influences how children process vulnerability and suffering, particularly when victims are labelled as disposable, invasive or pests). McPhedran, S. (2009). A review of the evidence for associations between empathy, violence, and animal cruelty. *Aggression and Violent Behavior, 14*(1), 1-4. https://doi.org/10.1016/j.avb.2008.07.005 Addington, Lynn and Coughlin, Claire and Coughlin, Claire and Coughlin, Claire and Coughlin, Claire and Hargreaves-Cormany, Holly and Randour, Mary Lou, Exploring Animal Cruelty Incidents Committed by Youth and Young Adults that are Reported to Police: A Research Note (October 01, 2025). Available at SSRN: https://ssrn.com/abstract=5637750 or http://dx.doi.org/10.2139/ssrn.5637750

[11] https://vine.org.nz/news/research-underlines-strong-link-between-animal-cruelty-and-family-violence-in-new-zealand

[12] https://www.spca.nz/downloads/pdf/assets/1307119/1/Predator+Free+2050+strategy+review+public+consultation+-+Department+of+Conservation.pdf

[13] Connell, R.M., 2011. *You can judge the heart of a man by his treatment of animals: finding the links between animal cruelty, empathy and aggression in a New Zealand high-school sample: a thesis presented in partial fulfilment of the requirements for the degree of Masters of Science in Psychology at Massey University, Wellington, New Zealand* (Doctoral dissertation, Massey University).

[14] The use of arbitrary, denigrating labels is also a convenient propaganda tool and cognitive shortcut for sidestepping human responsibility for the introduction of feral cats. Predator Free NZ's website confirms that "*Cats were one of the first introduced species to thrive in New Zealand. They arrived with European ships in 1769 because cats were carried onboard to keep rat numbers down. Fifty years later, there was an established feral cat population. Cats were then deliberately released in the 1870s in an attempt to control rabbit numbers*".

[15] Sections 3.4, 7.3 and 7.3.4.

[16] Based on 3,400 submissions.

[17] Doherty, T.S. and Ritchie, E.G. (2017), Stop Jumping the Gun: A Call for Evidence-Based Invasive Predator Management. CONSERVATION LETTERS, 10: 15-22. https://doi.org/10.1111/conl.12251

[18] Linklater W, Steer J. Predator Free 2050: A flawed conservation policy displaces higher priorities and better, evidence-based alternatives. Conservation Letters. 2018;11:e12593. https://doi.org/10.1111/conl.12593

[19] Leathwick, J.R. and Byrom, A.E., 2023. The rise and rise of predator control. *New Zealand Journal of Ecology*, *47*(1), pp.1-15.

[20] Wallach, A.D., Batavia, C., Bekoff, M., Alexander, S., Baker, L., Ben-Ami, D., Boronyak, L., Cardilin, A.P.A., Carmel, Y., Celermajer, D., Coghlan, S., Dahdal, Y., Gomez, J.J., Kaplan, G., Keynan, O., Khalilieh, A., Kopnina, H., Lynn, W.S., Narayanan, Y., Riley, S., Santiago-Ávila, F.J., Yanco, E., Zemanova, M.A. and Ramp, D. (2020), Recognizing animal personhood in compassionate conservation. Conservation Biology, 34: 1097-1106. https://doi.org/10.1111/cobi.13494

[21] WARBURTON, B. and NORTON, B.G. (2009), Towards a Knowledge-Based Ethic for Lethal Control of Nuisance Wildlife. The Journal of Wildlife Management, 73: 158-164. https://doi.org/10.2193/2007-313

[22] https://www.icam-coalition.org/topic/humane-cat-population-management-guidance/ p32: "*Lethal methods of population control aim to eradicate or significantly decrease cat populations through culling…are ethically questionable…hence alternatives should be pursued in preference…Although lethal methods can cause rapid depopulation, they are rarely effective in the long term in mainland areas. As long as food is available cats will potentially establish themselves in the empty niche…Also, with almost any control method or combination of methods a few breeding cats are left and they repopulate the area*");
see also the World Organisation for Animal Health's Terrestrial Animal Health Code, Article 7.7.1 (New Zealand is a Member of the WOAH).

[23] Robertson SA. A review of feral cat control. *Journal of Feline Medicine and Surgery*. 2008;10(4):366-375. doi:10.1016/j.jfms.2007.08.003

[24] Nogales, M. et al. (2004). *A review of feral cat eradication on islands.* Conservation Biology.
Campbell, K. et al. (2011). *Review of feral cat eradications.* Island invasives.

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[26] Longcore, T. et al. (2009). *Critical assessment of feral cat management.* Conservation Biology

[27] Lazenby, B.T., Mooney, N.J. and Dickman, C.R., 2015. Effects of low-level culling of feral cats in open populations: a case study from the forests of southern Tasmania. *Wildlife Research*, *41*(5), pp.407-420.

[28] Pech, R. and Maitland, M., 2016. Conservation of native fauna in highly invaded systems: managing mammalian predators in New Zealand. *Restoration Ecology*, *24*(6), pp.816-820.

[29] Paragraph 35.

[30] https://www.cbd.int/convention/articles?a=cbd-14

[31] Consistent with the NCMG's 'Key Recommendation' to "*determine the most humane approaches to…feral cat management*" and international guidance that "*alternatives should be pursued in preference* [to lethal methods]". We note, for example, that (i) the Australian Wildlife Conservancy manages feral cats via a safe-haven network of fenced areas where native mammals are securely protected against introduced predators like feral cats; and (ii) Trap, neuter and return is viewed as the most humane and effective way of managing feral cats in the UK.

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Schaffner, J.E. (2014). *The role of TNVR in humane population control.* Journal of Applied Animal Welfare Science.

[33] As required under paragraph 75 of General Comment 26 (2023).

[34] Consistent with the NCMG's 'Key Recommendation' in its Report of June 2025 to "*identify sensitive wildlife areas*" and its acknowledgement of a "*lack of reliable data*" and "*many unknown questions*". Section 8.3.2 of the NCMG's Report also recommends, as a "*research priorit[y]*", the preparation of "*a full ecosystem impact of managing feral cats, including impacts on other predators and prey species*." Under international law, the so-called 'precautionary approach' requires that "...*where potential adverse effects are not fully understood, the activities should not proceed*" (see, for example, Article 11(b) of the UN World Charter on Nature).

[35] Reflecting the NCMG's acknowledgement, in Section 1.3, that such "*[c]ollaboration between diverse national stakeholder organisations in the NCMG, and many others not yet involved, is the key to addressing these important issues*"; see also Section 9 ("*A strategic goal of the National Cat Management is humane and effective cat management is achieved through multi-stakeholder collaboration. This will require identifying and understanding the different stakeholders and their relationships with and concerns regarding cats*").

[36] Section 7.3.4 of the NCMG's Report confirms that "*[a] public education campaign should be planned and implemented well before a culling operation commenced*…".

[37] 1991Bester, M.N., Bloomer, J.P., Van Aarde, R.J., Erasmus, B.H., Van Rensburg, P.J.J., Skinner, J.D., Howell, P.G. and Naude, T.W., 2002. A review of the successful eradication of feral cats from sub-Antarctic Marion Island, Southern Indian Ocean. *South African Journal of Wildlife Research-24-month delayed open access*, *32*(1), pp.65-73.

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[39] Franck Courchamp, Department of Zoology, University of Cambridge, Downing Street, Cambridge, CB2 3EJ, UK. E-mail fc219@cam.ac.uk. Tel: 01223-336643. Fax: 01223-336676.

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