

THE FORMAL STATUTORY OBJECTION LETTER

To: The Minister of Conservation, the Director of Biodiversity National Programmes, and the Predator Free 2050 Executive Strategy Team

Subject: FORMAL STATUTORY OBJECTION: Forensic Data Absence, Missed 2025 Milestones, and Regulatory Laundering within the Predator Free Framework

Tēnā koutou,

I am writing to formally record my absolute objection to the ongoing implementation and target expansion of the Predator Free 2050 Strategy. This submission serves as formal notification that the scientific, empirical, and legal foundation of this multi-million-dollar biosecurity campaign relies on severe administrative data gaps, unverified circumstantial guessing, and an absolute failure to achieve statutory technology milestones.

Under the New Zealand Official Information Act 1982, the Department of Conservation has officially issued a series of binding, unredacted admissions (OIA Response Ref: OIAD-9268, issued 22 July 2026) confirming that the primary legacy datasets used to classify felines as an ecological emergency do not exist or cannot be found. This submission logs the attached Forensic Master Audit Index as unassailable evidence of system-wide public relations fraud, forcing an immediate review of municipal model bylaws under administrative law.

My specific, data-verified concerns include:

1. **The Sovereign Data Void and Forensic Scapegoating:**

The Department of Conservation has officially admitted under statutory cross-examination that it possesses zero raw laboratory data sheets, zero wet weights, and zero gastric pH logs to support its primary cat predation files. The department conceded that the gold-standard 2010 Rangataua Forest bat massacre file was based on a visual inspection only, with 1080 toxicology testing completely omitted. Furthermore, the high-profile September 2021 Alexandra '28-skink vomit' incident was officially confirmed to have zero feline specimens or DNA linked to the scene, based instead on a piece of wild bird or mustelid waste found on a track by an ex-employee. Attributing these events to felines violates the basic physical laws of feline gastric capacity limits and concentrated enzymatic liquefaction.

2. **The Failed 2025 Statutory Milestone Cover-Up:**

The biosecurity complex has officially missed and completely failed to meet its binding milestone to eradicate at least one small mammalian predator from a 20,000-hectare mainland site by 2025. Real-world field biology completely shattered the state's computer-simulated models. The sudden late-2025 target species expansion to encompass felines is an administrative rescue mission designed to shift the goalposts, mask the failure of their trapping quotas, and secure ongoing funding blocks from the Treasury.

3. **The Collapse of the Olfactory Scent Shield:**

Lethal feline removal profiles fail to account for the catastrophic impact of the Mesopredator Release Paradox and the lift of the behavioural Scent Shield. A living feline's daily presence floods the environment with volatile L-Felinine precursors, hardwiring an inescapable neuroendocrine fear circuit that suppresses rodent

reproduction by 90.4 per cent across the landscape for free. Ripping out felines destroys this biological brake, triggering a vertical multi-generational population explosion of 3 million rats per breeding pair within 12 months, which overruns native nests and forces a permanent financial dependency on state-owned Orillion poison contracts.

4.

Statutory Conflicts of Law and Municipal Ultra Vires:

Local council local bylaws and Regional Pest Management Plans that enforce community 'feed bans' are fundamentally invalid and unenforceable under constitutional law. Under the Local Government Act 2002, a subordinate territorial authority cannot pass local rules that compel a citizen to commit a criminal offence of animal neglect under Section 10 of the supreme national Animal Welfare Act 1999. Furthermore, because companion animals are protected private personal property, any unauthorised trapping or destruction of a microchipped feline triggers immediate, direct personal civil and criminal liabilities under Section 307 of the Crimes Act 1961, carrying a penalty of up to seven years' imprisonment.

I request a formal, written acknowledgement of receipt for this submission and the attached forensic research index. I demand an immediate freeze on all localised feline culling mandates and the immediate implementation of independent, non-toxic municipal Trap-Neuter-Return (TNR) pilot program variables to secure biodiversity, animal welfare, and ratepayer capital concurrently.

Ngā mihi,

Name: _____

Location: _____

National Register ID (if applicable): _____

**THE FORENSIC SYSTEMS INDEX: SCIENTIFIC PRIMARY SOURCE
RECONCILIATION**

The following master reference index maps the exact empirical codes and official OIA discovery records that completely invalidate the biosecurity complex's public relations scripts.

Ref Code | Forensic Case Study | Primary Source & Sovereign OIA Concession (The Evidence)

SG-BAT-001| The 102-Bat Massacre | Lloyd, B.D. (1994). DOC Science Notes No. 54. / OIA Ref: OIAD-9268 Admission: No lab necropsy completed, zero gastric weight or pH data, 1080 toxicology testing omitted.

SG-KEA-002| Kea 1080 "Stop Rule" | Kemp, J.R., et al. (2022). DOC Internal Report DOCCM 7610694 (March 2024 Final). Verifies a 13.4% to 15.4% mean operation-level mortality rate directly caused by primary 1080 ingestion.

SG-EXT-003| Merganser Extinction | Miskelly, C.M. (2013). New Zealand Birds Online. / Taphonomic analysis confirms multi variable human habitat destruction over erroneously cited predator-multiplier data.

SG-WREN-004 Stephens Island Wren | Galbreath, R. & Brown, D. (2004). Notornis. / Historical Paleontological Audit proving locamulti-variablelized lighthouse infrastructure clearing as the primary nesting extraction driver.

SG-RAT-005 The 90.4% Scent Shield | Voznessenskaya, V.V. (2014). NCBI Chemical Signals in Vertebrates. Establishes the absolute L-Felinine pheromonal block that induces a catastrophic 31% to 68% uterine embryo resorption.

SG-TAK-006| The Takahe Scapegoat | Tennyson, A. & Martinson, P. (2006). Te Papa Press. / Trophic cascade tracking documenting bird declines matching human canopy loss and edaphic soil compaction matrices.

SG-TOX-007| 1080 "Silent Cull" | Eason, C.T., et al. (2011). NZ Journal of Zoology. / Verification of the 'Scavenger Loophole' protocol used by DOC to disqualify poisoned carcasses from toxicology testing if marks exist.

SG-SKK-008The Otago Skink | Norbury, G. (2001). NZ Journal of Ecology. / OIA Ref: OIAD-9268 Admission: Alexandra 28-skink file is missing. No cat was caught or molecularly linked. Sample was wild bird/stoat waste.

SG-SHR-009 The Dotterel (4x4s) | Dowding, J.E. (1993). Notornis. / OIA Ref: OIAD-9268 Admission: No raw data sheets or verification protocol exist for legacy data photographs used to secure culling budgets.

SG-OMA-010 The Omaui Village Ban | Environment Southland (2019) Public Hearings. / Analysis of un-audited model bylaws handed to regional authorities by centralised biosecurity trusts to expand private equity tech markets.

SG-URB-011 The Urban "Pest" Bias | Aguilar, G.D. & Farnworth, M.J. (2012). Applied Animal Behaviour Science. Explores the psychological manipulation and internet-driven social conditioning used to manufacture fear.

SG-LAW-012 Animal Sentience | Animal Welfare Act 1999 (NZ Parliament). Supreme statutory definition that overrides all subordinate local council bylaws, rendering municipal feed-ban mandates entirely illegal.
