

POLICY Quarterly

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Editorial – Extreme Inequality as a Threat to Democracy

Globally, income and wealth inequality are reaching staggering levels. According to the authoritative *World Inequality Report 2026* (Chancel et al., 2025), the combined earnings of the top 10% of humanity are around seven times those of the bottom 50%. Wealth inequality is even more pronounced: the top 10% enjoy almost 40 times the wealth of the bottom 50%.

At the extreme end of the wealth distribution, inequality is even starker. For instance, fewer than 60,000 multi-millionaires possess three times more wealth than the bottom half of humanity combined. And a mere handful of the world's richest people have combined assets close to US\$2 trillion, roughly equivalent to those of the poorest several billion. On current trends, there will soon be trillionaires.

At the national level, across both developed and developing countries, income and wealth inequality is also marked. The bottom half of the population, for instance, rarely possess more than 5% of their nation's wealth. Similarly, gender inequality in both incomes and assets remains deeply entrenched. Compounding matters, both climate and tax injustice are rife: in most countries, wealthy citizens contribute vastly more emissions than the poor and pay far less than their fair share in taxes.

More concerning, however, are the threats posed by extreme socio-economic inequality to the integrity, legitimacy and stability of democratic governance. Admittedly, the relationship between inequality and democracy is complex and has been long debated. Nevertheless, while extreme inequality and democracy appear to have been compatible for many decades, ultimately the former poses serious risks to the quality and durability of the latter. The reasons are straightforward.

Political equality is a fundamental principle of democracy. At a minimum, citizens must enjoy equal political and civil rights, not least the formal equality of universal suffrage: each person's electoral participation must have broadly equal value and thus provide an equal opportunity to influence the composition and decisions of a nation's representative institutions.

Extreme socio-economic inequality, however, clashes with political equality in multiple ways. Substantial wealth, after all, can be conveniently and quickly – and often legally – converted into political power, while political power can, in turn, be employed to enhance the inequality of resources and opportunities. In short, without adequate procedural and regulatory checks and balances (e.g., to prevent electoral gerrymandering and the 'buying' of votes), a self-reinforcing spiral of rising political and economic inequality can readily occur, with each form of inequality feeding on the other. Eventually, plutocracy or autocracy replaces democracy.

The second Trump administration vividly illustrates the multiple pathways of democratic corrosion and decay. Among these are using wealth to exercise a disproportionate sway on public opinion and policymaking through extensive lobbying, purchasing political access, and funding political parties and candidates (at all levels of government), along with influencing political appointments and manipulating political reporting and commentary (e.g., via concentrated media ownership, including social media platforms, and editorial control). Other pathways include explicit corruption and unethical behaviour (e.g., bribery, nepotism, cronyism, extortion, graft, influence peddling, kickbacks, abuse of discretion) and the undermining of independent public institutions and the rule of law.

Democratic governance is further eroded where a few extremely wealthy individuals not only influence government decision making in several important policy areas (e.g., specific regulatory matters) but also

exert a powerful sway across a broad range of contemporary issues. In such situations, policymakers' responsiveness to voter preferences declines, political trust vaporises, corruption becomes more endemic, pernicious polarisation escalates, and voters lose confidence in the integrity of democratic norms, processes and institutions. Alienation, disenchantment and grievances intensify. The primary beneficiaries are autocrats, populists and illiberal social movements.

Aotearoa New Zealand is not immune to such processes. Egalitarian values, which were once a hallmark of the country's political culture, are no longer dominant. Both income and wealth inequality, while certainly less extreme than in some OECD countries, are much greater (on a range of standard measures) than during the immediate post-war era. And, regrettably, the damaging political consequences of heightened socio-economic inequality are becoming more evident.

If democratic norms, processes and institutions are to be protected in such a context, two broad options are available. The first is to reduce inequality. The second is to insulate democratic governance from the worst effects of vastly unequal resources. Arguably, both options are needed. Yet both are problematic.

Regarding the first: politically, increasing socio-economic inequality is much easier than reducing it. The rich are invariably content to become richer, but highly resistant to being made poorer. Also, in a globalised world, limiting or lessening inequality in individual countries can be readily thwarted, at least partially, by the capacity of rich individuals to migrate and/or move their assets across borders. Realistically, therefore, while a combination of policy reforms covering taxation, social transfers and various regulatory matters can influence the distribution of income and wealth, reducing inequality sustainably and significantly (e.g., as measured by the Gini coefficient) will be politically challenging – except perhaps during a major global financial crisis and/or an extended national or international emergency of another kind.

The second option involves mitigating the corrupting impact of socio-economic inequality on democratic processes by lessening the capacity of the rich to exercise a wholly disproportionate influence on policymaking. In effect, this means enhancing the overall quality and resilience of democratic governance.

There are many ways of pursuing this objective, as recent contributions by Sir Geoffrey Palmer (2025) and Philippa Yasbek (2024) highlight. But efforts to reduce the easy conversion of economic power into political power, whether through constitutional, institutional or regulatory reforms, are often politically inconvenient and/or technically complex. Typically, they also lack sustained and vigorous public support. As with reducing inequality, a deep and lasting crisis may be necessary to facilitate the desired reforms. Yet crises can be politically destabilising – and damaging democratically.

That may be an unhappy conclusion. But realists, while ever hopeful, must be realistic.

Jonathan Boston, co-editor

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Karen J. Baehler

The Trump Administration and the US Federal Government Workforce, One Year in

a year ago of Trump's early manoeuvres on federal employment policy (see Baehler, 2025).

In this analysis, I summarise the administration's main moves in 2025, the resistance they did and did not encounter, and the net impacts of their actions on the federal workforce and governing capacity. In contrast with *Washington Post* reporters who recently referred to 2025 as 'the year Trump broke the federal government' (Natanson and Kornfield, 2025), I stop short of declaring the system fully broken ... yet.

Where did the Trump administration focus its anti-'deep-state' crusade in 2025?

Specific strategies for transforming the federal bureaucracy in Trump's image have been clear from the beginning thanks to the 900-page blueprint for his second term, *Mandate for Leadership*, often referred to as 'Project 2025'. The non-partisan American Civil Liberties Union refers to Project 2025 as 'a roadmap for how to replace the rule of law with right-wing ideals' (ACLU, 2025), including absolute presidential control of the entire federal workforce. The roadmap also has many features in common with what is known as 'unitary executive theory', in accordance with which the US president is viewed as having sole authority over all aspects of the executive branch of government.

Trump and his followers deem such control and authority necessary to avoid

Abstract

Donald Trump's attacks on the federal bureaucracy in 2025 sorely tested the American system's civil and constitutional guard rails. Although he made significant advances on this front in the first year of his second term, he has some distance to go before achieving his goal of transforming the civil service into an instrument of his personal will.

Keywords federal workforce, career civil service, federal bureaucracy, Trump cuts, Trump downsizing

The beginning of 2026 witnessed hundreds of articles and podcasts recapping the second Trump administration's initial year in office, including many focused on his brazen efforts to purge and consolidate control of the federal bureaucracy. This article follows up and builds upon my analysis

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what they saw as bureaucratic obstruction during his first term by hordes of left-wing zealots in civil service positions who allegedly ran the federal government on behalf of Trump's political enemies. Fuelled by animus towards this imagined 'deep state' cabal, the second Trump administration took office determined to quickly 'bend or break the bureaucracy to the presidential will' (Project 2025, 2023, p.44).

My previous article identified the main tools for doing so: lay-offs, incentives to encourage voluntary exits, and

(DEIA) programmes and initiatives. A follow-up memo the next day ordered agency heads to put those workers on paid leave immediately. As a result, every department lost positions in their civil rights, equal opportunity and related units. Some workers with no obvious connection to DEIA were also swept up, including those in areas such as employee engagement and Native American tribal relations, and people who had participated in diversity training or related programmes in the past (Meckler, Natanson and Mark, 2025).

Many federal employees reported feeling insulted and perplexed by the DRP offer, amidst questions about its legality and potentially 'false promises' ...

reclassification of positions to exclude them from merit service protection. Trump advanced on all these fronts, and more, in 2025.

Lay-offs

Lay-offs enabled rapid downsizing of the federal workforce last year, although we may never know the exact number of workers affected. According to the US Office of Personnel Management (OPM), 322,000 workers exited the federal government in 2025 (starting after inauguration day) and 102,000 were hired, for a net loss of 219,000 – roughly 10% of the 2.3 million civilian federal workers on the job in 2024.

Of the 322,000 departures, OPM classifies 24,000 as involuntary, which includes 17,000 due to downsizing and 7,000 terminations of recent hires on probationary status (Korte, 2025). Other sources report a larger number (25,000) of probationary employees fired (Katz, 2025a).

Lay-offs also enabled the administration to damage, and in some cases eliminate, whole units and programmes the president doesn't like. On day one, Trump used executive order 14151 to terminate all diversity, equity, inclusion and accessibility

Agencies seen as not fully embracing Trump's policy agenda experienced very deep workforce cuts in 2025. These are just a few of the many examples (Badger, Paris and Parlapiano, 2026):

- Federal Student Aid Office (-46%)
- Minority Business Development Agency (-51%)
- Council on Environmental Quality/ Office of Environmental Quality (-51%)
- Office of Lead Hazard Control and Healthy Homes (-52%)
- Agency for Health Care Research and Quality (-64%)
- National Endowment for the Humanities (-73%)
- US Agency for International Development (USAID) (-92%)
- Office of Pandemic Preparedness and Response Policy (-100%)

By contrast, departments favoured by Trump lost fewer than 10% of their employees:

- Department of Homeland Security (DHS) (-1%)
- Department of Veterans Affairs (-6%)
- NASA (-6%)
- Department of Defense (-8%).

A small number of agencies added positions. The Immigration and Customs

Enforcement (ICE) arm of DHS grew 29% as of November 2025, according to OPM data (ibid.). Other reports indicate a much larger ICE hiring surge of 120% between July 2025 and January 2026 (Katz, 2026).

Most lay-offs occurred in January, February and March 2025 during the brief tenure of Elon Musk, a celebrity billionaire and Trump's top campaign donor, at the helm of the highly publicised Department of Government Efficiency (DOGE). DOGE, which managed the downsizing process, favoured abrupt dismissals en masse, as practised widely in the corporate sector, including companies owned by Musk. Termination notices were effective immediately. Many federal workers discovered they had been let go when their building or email access was suddenly denied. As news of the first cuts quickly circulated, supervisors and workers across the federal government found themselves plunged into uncertainty.

Among the lay-offs planned for 2026 are 35,000 more employees at the Department of Veterans Affairs, which includes doctors and nurses. Veterans Affairs lost 30,000 positions in 2025, roughly 6% of its 2024 total of 475,000. Nearly 90% of the lost positions were in health care, including nurses, physicians, mental health providers and schedulers (Baker, 2026). The Federal Emergency Management Agency (FEMA) plans several waves of cuts, the first of which began on New Year's Eve 2025. Based on leaked documents, FEMA's targeted cuts include a 41% reduction in CORE workers (Cadre of On-Call Response and Recovery), and an 85% reduction in standby workers (Sacks, 2026).

'Voluntary' separations

DOGE also utilised a modified buy-out technique for incentivising voluntary resignations. More than two million federal workers received the now-famous 'Fork in the Road' email from OPM on 28 January 2025. The email, which invited federal employees to resign effective 30 September and go on administrative leave with full pay and benefits for the intervening eight months was modelled on one used by Musk to slash Twitter's payroll (now X) after he acquired the company in 2022.

Estimates of how many workers accepted the offer, known as the deferred resignation programme (DRP), range between 150,000 and 200,000. Many reported doing so under duress due to 'heavy pressure campaigns' that accompanied the email, including implicit and explicit threats of future mass lay-offs or relocations for those who tried to hang on to their jobs (Katz, 2025b). Efforts to 'demean feds into taking the resignation offer'¹ included statements on OPM's website such as, 'The way to greater American prosperity is encouraging people to move from lower productivity jobs in the public sector to higher productivity jobs in the private sector' (Wagner, 2025a). Although the DRP offer went to all employees, the subsequent pressure campaigns appear to have targeted Trump's least favourite parts of the government (Bender, Silver-Greenberg and Flavelle, 2025).

Many federal employees reported feeling insulted and perplexed by the DRP offer, amidst questions about its legality and potentially 'false promises' (Bogardus and Bravender, 2025). Many felt caught between two awful choices: the grim prospect of staying and working under toxic leaders who might order new lay-offs or relocations at any point and the heartbreaking decision to permanently leave one's 'calling' and the 'transcendent national interest' one had planned to spend a career serving (Foer, 2026).

Distrust of the DRP grew with time as errors came to light. Some workers who accepted the offer were informed they were not eligible, then fired, and ultimately reinstated (Natanson et al., 2025). Others were told they were not eligible and then later accepted into the programme. In the meantime, some workers were left without health insurance coverage, unsure of their employment status and unable to apply for unemployment insurance. 'They are really in limbo,' said one union official (Bogardus et al., 2025).

Reclassification

In a classic illustration of the ephemeral nature of executive orders as policy tools, President Trump on day one of his second term revoked President Biden's earlier revocation of an executive order Trump signed at the end of his first term.

The current executive order (EO 14171) creates a new class of federal workers, known previously as Schedule F and now as Schedule Policy/Career (P/C), consisting of 'career positions in the Federal service of a confidential, policy-determining, policy-making, or policy-advocating character'. The executive order authorises a process for reclassifying existing positions from other schedules into Schedule P/C and then exempts positions in this class from 'competitive hiring rules' and 'adverse action procedures' to give agencies more

employees. At first glance, this might seem perfectly reasonable for employees in true policy-facing jobs. But upon closer inspection, this executive order represents a significant threat to the apolitical (i.e., non-partisan) culture of the entire civil service, for two reasons: first, because of very broad discretion around the definition of what counts as a policy-related role; and second, because it elides the current distinction between the fundamental obligations of career service employees and political appointees.

Plucking the word 'faithfully' from its constitutional context and swapping 'administration policies' for 'the Laws' might fool some people into accepting Trump's redefinition of the career federal service, but it shouldn't.

flexibility in managing their policy-facing career employees.

OPM expects roughly 50,000 current positions to be reclassified as Schedule P/C (around 2.5% of the civilian federal workforce), many fewer than the 200,000 jobs thought to be eligible in Trump's first term. Internal documents from agencies provide evidence of senior Trump officials applying 'sweeping' and 'maximalist' interpretations of what counts as a policy-related role – definitions that include large numbers of currently unionised workers not typically associated with policy work (Wagner, 2025b). Projections by watchdog groups indicate potential for reclassifying very large numbers of employees (Partnership for Public Service, 2025a).

No jobs have yet been reclassified as Schedule P/C. Assuming legal challenges are resolved (discussed later), the process is expected to begin in early 2026. OPM proposed regulations to implement the order in April 2025 and finalized them in February 2026.

Removing merit service protections makes members of Schedule P/C at-will

Indeed, the language of the amended executive order essentially invites politics into federal personnel actions by enabling agency heads and White House officials to dismiss career civil servants for thinly veiled political reasons. Section 6(ii)b reads:

Employees in or applicants for Schedule Policy/Career are ... *required to faithfully implement administration policies* to the best of their ability, consistent with their constitutional oath and the vesting of executive authority solely in the President. Failure to do so is grounds for dismissal. (emphasis added)

Those familiar with the Constitution will recognise the contradiction in that sentence. Contrary to the executive order, the fundamental duties of career civil servants do not arise from any specific administration's policies, but rather from the laws/statutes and regulations that govern the agencies where those employees work. Their duties flow from the oath they

take to ‘support and defend’ and ‘bear true faith and allegiance to’ the US Constitution, including the Constitution’s description of the executive branch in Article II, according to which the president ‘shall take Care that the Laws be faithfully executed’.

Plucking the word ‘faithfully’ from its constitutional context and swapping ‘administration policies’ for ‘the Laws’ might fool some people into accepting Trump’s redefinition of the career federal service, but it shouldn’t. ‘[T]he Laws’ which are to be ‘faithfully executed’ persist across presidential administrations until Congress changes them. A requirement to ‘faithfully implement administration policies’ rather than ‘the Laws’ on threat of dismissal makes civil servants deeply beholden to a

Trump’s workforce policies never mention the importance of implementing laws and statutes. The absence is conspicuous and deliberate.

Regarding politicisation, the Schedule P/C executive order tries to offer reassurance that the administration values the apolitical nature of the career service:

Employees in or applicants for Schedule Policy/Career are not required to personally or politically support the current President or the policies of the current administration. (Section 6(ii)b)

But note the ambiguity. According to EO 14171, an employee can be dismissed for not ‘faithfully’ implementing an administration

significant, often specialised, expertise in the relevant laws and regulations.

A crucial lesson from 2025 is that federal employment policy (and all other policies) must function effectively under abnormal as well as normal circumstances. When ‘presidential authority is wielded in bad faith’ for the purpose of ‘deliberately weakening agencies charged with implementing laws the president opposes’, it is vital to resist the summary dismissal of career public servants who choose not to blindly follow bad-faith orders (Bednar, 2026). Workforce policies should recognise that a presidential administration’s policies do not always align with, and cannot be substituted for, ‘the Laws’ or the Constitution.

Explicitly political removals

In his 4 March 2025 ‘State of the Union’ address, Trump promised to ‘reclaim power from this unaccountable bureaucracy ... Any Federal bureaucrat who resists this change will be removed from office immediately, because we are draining the swamp.’ Early in the year, federal employees in the Department of Justice found themselves being removed merely on the assumption that they would resist Trump’s agenda.

The first to be removed were more than a dozen lawyers who worked with Special Counsel Jack Smith on two federal criminal cases against Trump during the Biden administration (Lynch and Goudsward, 2025a). Within days of those removals, dozens of prosecutors and FBI agents who handled cases related to the 6 January 2021 attack on the US Capitol also were fired (Cheney and Gerstein, 2025; Lynch and Goudsward, 2025b). Recent reporting indicates continued efforts in 2026 to ‘scour the FBI’s vast holdings to root out negative information about those who once investigated President Trump’ (Thrush and Feuer, 2026).

In a different type of high-profile case, Department of Justice lawyer Erez Reuveni was placed on administrative leave and then fired for admitting to a judge that he was frustrated by a lack of access to vital information about the case at hand (Hsu, 2025). US Attorney General Pam Bondi, who heads the department, interpreted Reuveni’s answers to the judge’s questions as examples

‘Weaponisation of government’ is Trump’s all-purpose epithet for the many abuses he accuses the Obama and Biden administrations of committing with help from the career public service.

single president. This is intentional, of course. Trump wants all federal workers to owe their duty to him directly rather than to the Constitution or the statutes authorising their agencies. The president being an elected official, the executive order unavoidably introduces politics into a large group of career positions. Put simply, the order creates a direct confrontation between Schedule P/C workers’ new job descriptions and their constitutional and statutory obligations.

This wording trick appears to be a favourite of the current administration. A different day-one decree, EO 14170, prevents the hiring of individuals who are unwilling ‘to faithfully serve the Executive Branch’ – yet another misleading characterisation of who or what civil servants are meant to be faithfully serving. The three branches of government were created to serve the people, not the other way round. It is interesting to note that

policy, which means employees are required to *professionally* support the current president and the current administration’s policies. Is professional support effectively different from personal or political support, and if so, how? The answer is not obvious, and the text of the executive order does not clarify.

In practical terms, most presidents in the past have attempted to issue policies and orders consistent with existing laws, while also recommending (indeed, urging) Congress to consider new laws or amendments that they ‘judge necessary and expedient’, per the Constitution’s clear description of the job (Article II). In practice, career employees often help new occupants of the White House and their staff understand how the administration can and cannot use current law to accomplish their goals. Under normal circumstances, this is a vital service provided by federal employees with

of insufficiently 'zealous advocacy' for the government's position. She cited those grounds as justification for his firing.

In June 2022 a dozen highly experienced FBI special agents successfully de-escalated a potentially violent crowd-control situation on the streets of Washington, DC by adopting a kneeling position to signal non-aggression. Although a 2020 internal review of the agents' actions found them consistent with FBI policy and a 2024 inspector general's report did not cite any misconduct, photos of the incident went viral on social media and led to right-wing accusations that the agents were kneeling to demonstrate inappropriate partisan support for the protestors' cause. (The crowd was protesting against racial injustice.) The agents have steadfastly maintained that their actions were motivated solely by the urgent need to interrupt rising hostilities.

Almost immediately upon taking office – fully five years after the incident – Trump's new FBI director, Kash Patel, removed some of those agents from their supervisory roles and launched a new investigation. The FBI then fired all 12 agents in September 2025, before the latest investigation had concluded, on grounds of 'unprofessional conduct and a lack of impartiality in carrying out duties, leading to the potential weaponization of government' (Johnson, 2025). The 2025 agency review found no misconduct by the agents, thus laying bare the political nature of the firings.

'Weaponisation of government' is Trump's all-purpose epithet for the many abuses he accuses the Obama and Biden administrations of committing with help from the career public service. Curiously, 'weaponisation' to the MAGA mind appears to be a one-way street. According to MAGA rules, it applies only to actions taken by Trump's political enemies against Trump and his inner circle. When the Trump administration pursues explicit political payback within the civil service, especially the Department of Justice, they claim to be 'de-weaponising' the government.

Attacks on collective bargaining

Roughly one quarter of all federal civilian employees belong to one of 100-plus different unions representing federal employees in various sectors across the

government. Major government-wide unions include the National Treasury Employees Union, the American Federation of Government Employees and the American Federation of State, County, and Municipal Employees.

Trump's executive orders 13251 and 14343 stripped the right to collective bargaining from roughly one million workers in about 40 agencies in March and August 2025. This led to a cascade of agency actions to cancel union contracts, including at the Environmental Protection Agency, Department of Veterans Affairs, Federal Bureau of Prisons and Transportation Safety Administration, in the last five months of the year (Economic Policy Institute, 2025).

of Education's Office of Civil Rights, which spent \$40 million paying employees to stay home on administrative leave in 2025 and then decided in December to recall 200 of those employees to handle a rapidly growing backlog of civil rights complaints (Miranda, 2025). How long the reinstated jobs will last is anyone's guess.

At the Government Services Agency, a major target of DOGE, nearly 80% of headquarters staff, 65% of portfolio managers and 35% of facilities managers were cut via various means before it became clear that the agency was floundering in 'triage mode' and basic services were not being delivered (Goodman and Foley, 2025). The agency ended up rehiring around 285 of the 600–

The Republican majority in the House of Representatives is seeking deep funding cuts and restrictions on the [Accountability] office's authority to investigate Trump's cuts ...

What resistance did the administration encounter in 2025?

My previous article discussed the potential for constitutional and civil society guard rails to prevent Trump from breaking the federal government. Civil society organisations demonstrated extraordinary energy and creativity throughout 2025 and show no signs of slowing down in 2026. Regarding the constitutional principle of checks and balances, the other branches of government have provided minimal protection.

But before examining institutional guard rails, it is worth noting evidence of common sense being exercised in a few situations and the role of independent watchdog agencies within government.

Common-sense rehiring

As of November 2025, Brookings Institution scholars had collected news reports of more than 25,000 DOGE-induced firings followed by messy efforts to rehire the same workers (Kamarck, 2025). Examples include the Department

of Education's Office of Civil Rights, which spent \$40 million paying employees to stay home on administrative leave in 2025 and then decided in December to recall 200 of those employees to handle a rapidly growing backlog of civil rights complaints (Miranda, 2025). How long the reinstated jobs will last is anyone's guess.

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Watchdogs

The Government Accountability Office had a very busy year in 2025. In response to requests from members of Congress,

by April the agency had opened 39 investigations of presidential efforts to defer or cancel congressionally appropriated spending, and three audits of how DOGE had used data in the Department of Treasury, Social Security Administration and OPM (Brackman, 2025; Heckman, 2025). In July, three Democratic senators introduced legislation entitled the Pick Up After Your DOGE Act (Senate Bill 2533), authorising the Government Accountability Office to examine DOGE's access to sensitive government IT systems across the federal government.

The Government Accountability Office's ability to continue this work depends on the result of congressional budget negotiations in January 2026. The

Despite Trump's best efforts to suppress them, inspectors general continued to function. At the Department of Treasury, for example, the inspector general reported that nearly all the 7,300 probationary employees fired from the IRS in February 2025 on grounds of unsatisfactory performance were dismissed improperly. The inspector general found that more than half the fired workers had not yet been performance-rated, and 99% of those who had been rated received scores of 'fully successful or better'. After placing the terminated employees on administrative leave in March pending legal challenges, the IRS in May informed them that they could return to work. In response, 3,000 returned.

The first incident involved apparently 'accidental' terminations of employees at the Department of Agriculture unit that was managing the H5N1 avian flu outbreak – a severe illness that had been decimating poultry flocks and driving up the price of eggs, a major talking point for the president. The department quickly moved to 'rectify the situation and rescind those letters' after the situation came to light (Smith, Zanona and Strickler, 2025).

In a second incident, termination notices were sent to about 300 probationary employees in the Department of Energy's National Nuclear Security Administration (NNSA), which oversees the country's nuclear arsenal. Those lay-offs were rescinded 24 hours later, after members of Congress raised concerns about the threats posed by understaffing this critical function (CBS News, 2025). Some of the reinstatement letters were delayed, however, because the employees' work emails were turned off and NNSA did not have alternative contact information (Kim, 2025).

Members of Congress have also exercised their power of the purse with a somewhat surprising level of bipartisan agreement recently.² As the House of Representatives completed negotiations on multiple bipartisan spending bills in advance of the 30 January 2026 deadline for avoiding another government shutdown, it became clear that lawmakers were 'quietly rejecting almost all of the deepest cuts to federal programs that President Trump requested for this year' (Edmondson, 2026).

The funding bill for foreign aid, for example, contains \$50 billion, which is \$19 billion more than Trump requested. The bill would cut 16% from the previous year, compared with Trump's proposed 50% cut. Some bills contain continued funding for programmes Trump wanted to shutter, such as Voice of America, the National Endowment for Democracy and the National Endowment for the Arts, while also rebuffing Trump's request to zero out contributions to the United Nations and other international organisations (Katz, 2026). Other bills cut the IRS's tax enforcement unit by 7% rather than Trump's requested 34% and maintain steady funding levels for the National

If the president's popularity continues to decline, Republicans running for re-election may need to start distancing themselves from Trump and looking for new policy messages.

Republican majority in the House of Representatives is seeking deep funding cuts and restrictions on the office's authority to investigate Trump's cuts, but the Senate has favoured level funding.

My previous article mentioned Trump's firing of 17 inspectors general early in 2025. These are the department-level internal watchdogs who ask hard questions about waste, fraud and abuse within agencies. Non-partisan accountability experts recommend adding, rather than subtracting, investigative and enforcement capacity if the goal is to improve detection of waste, fraud and abuse, punish it more swiftly and deter it more effectively (Steuerle, 2025). Despite his bellicose rhetoric about cracking down on waste, fraud and abuse in the federal government, Trump left many inspector general positions unfilled for months and withheld funding for offices that support these functions.

Congress

Where institutional guard rails are concerned, one might expect the legislative branch to pose the most significant obstacle to Trump's gutting of the federal workforce, because the president is essentially cancelling spending that Congress duly authorised and appropriated. Yet throughout 2025 most Republicans in Congress continued to put their loyalty to the Republican president above their obligation to protect Congress's powers.

A few exceptions to this pattern deserve attention. Within weeks of the inauguration, Republican members of Congress began privately warning the Trump administration of their concerns about DOGE's more reckless cuts. After two especially egregious incidents, some Republican lawmakers even called on DOGE publicly to slow down and consider consequences before wielding the metaphoric chainsaw.

Science Foundation and NASA's science units despite requests for deep cuts.

Congressional Democrats continue to protest about nearly everything Trump does, of course, but the administration will not experience pressure intense enough to influence its approach until large numbers of Republicans break from the president. Although no one expects such a break, much will depend on the public mood in the run-up to the mid-term elections, when all 435 seats in the US House of Representatives and one third of the Senate's 100 seats are due to be contested. If the president's popularity continues to decline, Republicans running for re-election may need to start distancing themselves from Trump and looking for new policy messages.

States

It is poorly understood that 80–85% of federal workers work outside Washington, DC. As the scale of Trump's downsizing plans came to light, many states quickly established programmes to help federal workers residing in their states find new jobs following lay-offs, deferred resignations and ordinary resignations. Recognising the large volume of expertise exiting federal agencies as a valuable asset, some state government agencies actively recruited former federal staff to join them. In addition, state attorneys general filed hundreds of lawsuits challenging the many 2025 presidential orders and executive actions that posed harms to states.

Civil society organisations

Tracking pro-democracy, pro-rule-of-law and pro-civil service activity in the US's highly dispersed and decentralised non-profit and advocacy sectors poses a significant challenge. The most visible projects in 2025 consisted of organised public demonstrations in cities across the US and lawsuits filed by interest groups, often in collaboration with federal workers' unions and/or state attorneys general. Some of the organisations leading these activities sprang up after the 2024 election for the purpose of safeguarding institutions considered under threat. Others began during Trump's first term in office. Others are older organisations that have chosen to focus on responding to

Trump's legal and constitutional excesses through civic action, education and civil litigation.

Key groups include: the Washington Litigation Group, Democracy Forward, the NAACP's Legal Defense Fund, Protect Democracy, Common Cause, No Kings, the American Civil Liberties Union, the American Friends Service Committee, Citizens for Responsibility and Ethics in Washington (CREW), the Coalition for Democracy, Democracy Defenders Fund, Public Citizen, the Urban Justice Center, Judicial Watch, Lambda Legal, Indivisible, Human Rights Campaign, League of Women Voters, the Robert and Ethel Kennedy Human Rights Center (somewhat ironically), and many, many others.

disagreements. A dozen staff left in December to join former vice president Mike Pence's organisation, Advancing American Freedom, which offers a non-MAGA conservative alternative.

The sheer size and scale of anti-Trump protests captured attention in 2025, with an estimated 5 million participating in 'No Kings' demonstrations across the country in June and 7 million on 18 October. Although these numbers represent historically large turn-outs for public demonstrations in the US, even the largest attracted only 2% of the total population.

Government worker unions

The Trump administration's contemptuous treatment of federal workers spurred

The lawsuits began almost immediately following Trump's initial surge of executive orders and continued to roll out throughout 2025.

In October 2025, a coalition of more than 3,700 non-profit organisations signed a joint statement (Democracy Defenders Fund, 2025) condemning the Trump administration's efforts to characterise progressive causes as part of a proto-terrorist network of extremists that 'embraces and elevates violence to achieve policy outcomes', in Trump's words (White House, 2025). The coalition is part of an effort to create a sort of 'NATO for nonprofits' that would view an attack on one non-profit member as an attack on all (Nicholas, 2025).

New pro-MAGA and pro-Trump groups have also been forming, and many previous groups continued to grow and amass influence in 2025, such as Turning Point USA, the late Charlie Kirk's organisation, and the America First Policy Institute, which formed in 2021 to prepare an agenda for a possible second Trump term. One key organisation, the Heritage Foundation (lead architect of the Project 2025 report), has struggled with internal

union membership in 2025. One example is the American Federation of Government Employees which added 13,000 new dues-paying members in January and another 4,300 in the first five days of February – a total 6% increase (Bender, Silver-Greenberg and Flavelle, 2025).

Unions even received a somewhat surprising boost from the US House of Representatives, which passed bipartisan legislation on 11 December – the Protecting America's Workforce Act – designed to nullify Trump's March and August anti-collective bargaining executive orders. The orders remain in place, however, because the bill has yet to be considered in the Senate.

Perhaps most importantly, government unions have played key roles as plaintiffs in many of the lawsuits brought against the Trump administration's workforce policies.

The courts

The lawsuits began almost immediately following Trump's initial surge of executive

Table 1: Status of legal challenges against the Trump administration since 20 January 2025

Status	Workforce cases	FOIA & records cases
Government ‘wins’		
TEMPORARY BLOCK of government action DENIED	24.5	3.5
Government action NOT BLOCKED, pending appeal	15	0
Case closed / dismissed in favour of GOVERNMENT	12	0
Sub-total	51.5	3.5
Plaintiff ‘wins’		
Government action TEMPORARILY BLOCKED	32.5	0.5
Government action BLOCKED	4	3
Government action BLOCKED, pending appeal	6	1
Case closed / dismissed in favour of PLAINTIFF(S)	4	1
Sub-total	46.5	5.5
Other		
Awaiting court ruling	55	63
Case closed	12	0
TOTAL	165	72

Source: calculated based on *Just Security’s* Trump Administration Litigation Tracker

orders and continued to roll out throughout 2025. *Just Security*, a digital law and policy journal housed at New York University’s School of Law, has been tracking legal challenges to the Trump administration’s executive actions since 29 January 2025. Out of the tracker’s current database of 587 cases, 165 challenge either Trump’s federal workforce actions – such as political firings, large-scale reductions in force, rescission of collective bargaining, restrictions on government employees’ freedom of speech, restrictions on eligibility for public service loan forgiveness, disclosure of civil service records, appointment of acting US attorneys, the DRP and Schedule P/C – or policies with significant implications for the workforce, including dismantling of programmes and agencies, relocation of agencies, and the DEIA ban.

The second column of Table 1 lists the status of those 165 cases as of mid-January 2026. Another 73 cases are specifically challenging the Trump administration’s refusal to respond to official requests for information about DOGE’s activities and other administration actions under the Freedom of Information Act (FOIA) and/or the administration’s records retention practices. The status of those cases is recorded in column 3 of Table 1.

Table 1 shows that most cases are still working their way through the system. Of those that have been resolved, the record

is mixed, and most successes for plaintiffs involve only temporary blocks of the administration’s actions.

Three workforce-related cases were appealed all the way to the conservative-leaning Supreme Court of the United States (SCOTUS), where they were all decided in Trump’s favour with brief, unsigned orders. On 8 April 2025, SCOTUS blocked a federal judge’s order to rehire terminated probationary employees while legal challenges were proceeding. On 8 July, SCOTUS lifted a federal judge’s order blocking large-scale federal reductions in force while legal challenges were proceeding. On 14 July, SCOTUS lifted a federal judge’s order to reinstate 1,400 workers to the Department of Education. Although these decisions cleared a path for the administration to dismantle the Department of Education and pursue mass lay-offs in multiple agencies, as threatened, other legal challenges to the government’s actions were still pending in multiple courts and new challenges were being filed. The legal uncertainty caused some departments to put employees on paid leave rather than dismissing them immediately.

One thing we have learned from this body of cases is that the courts are unlikely to play a definitive role in protecting bureaucratic capacity in the remainder of Trump’s term for the simple reason that

existing statutes grant presidents very broad powers to structure the federal civil service as they see fit. As one administrative law expert put it, presidents have ‘far more legal authority over the federal workforce than most scholars, journalists, and even many public servants realize’ (Bednar, 2026). Even the most enlightened judges cannot change that reality. Courts could, however, choose to exercise less deference towards an administration that is clearly on a destructive rampage.

What can we say about the net impact of the 2025 assault on the federal bureaucracy?

The federal bureaucracy always needs reviewing to maintain efficiency. President Clinton led the last concerted effort to do so 30 years ago. His National Performance Review conducted careful, systematic reviews of functions and worked with Congress to enact streamlining reforms into law. Ultimately, although Congress did not approve all of Clinton’s cuts, the number of federal workers decreased by 4% over eight years. Since then, as new pockets of inefficiency have undoubtedly formed, good-faith proposals for smart, targeted trimming could earn bipartisan support and yield both budget savings and improved effectiveness.

By contrast, Trump and Musk’s politically targeted pillaging spree has been unprecedented in scale, incompetence and brutality, which also makes its long-term effects very difficult to project. Although the full impact on US governmental capacity will take years to fully manifest, early consequences have begun to appear.

The costs of chaos

First and foremost are the immediate costs of firing and rehiring workers, putting large numbers of workers on extended paid leave, damaging workforce productivity by ramping up uncertainty, and forfeiting tax revenue by firing IRS employees who enforce tax collection. Various sources have estimated these costs at \$135 billion (Williamson, 2025). Less obvious costs, such as fines paid for letting government office leases expire without vacating the buildings, will be identified as time goes by (PBS, 2025).

Litany of visible harms

Documented short-term impacts of the Trump shake-up include: reduced and slower health services for veterans; delayed improvements to the nation's organ transplantation system; fewer launches of weather balloons; lack of classroom access for disabled students; and cuts in various services at national parks, including fewer open hours at visitor centres, beach closures, reduced tours, and inability to reserve campsites in national parks during peak summer months (Ellis, 2025). The federal government's 13 statistical agencies lost 20–30% of their staff over the year, leading to what the American Statistical Association has called a 'severe decline' in their 'ability to meet their basic mission' (Alms, 2025).

At the community level, documented effects include cutbacks and cancellation of after-school and literacy programmes, local mental health services, and school repair and construction projects; lay-offs of university faculty; reduced scholarships for students; threats to the continuation of food banks; and interruptions to school lunch and other meal programmes for underserved groups, which in turn reduces income to farmers who supply those programmes (Partnership for Public Service, 2025c). Drainage and flood control projects have been cancelled, as have improvements to broadcasting infrastructure that enables emergency alerts. Fewer clinical trials of new medicines means less access to treatment for patients.

Long-term capacity

Long-term impacts of a less experienced federal workforce are difficult to predict but potentially worrying. Many federal employees who took the DRP buy-out or resigned outright had specialised skills and experience that are in demand in the private sector; they will be difficult to replace. Take food safety inspectors, for example. Although the administration did not target food inspectors for termination, 63% of those who voluntarily left the Department of Agriculture's Food Safety and Inspection Service were inspectors (Henderson, 2025). ProPublica also recently reported a sharp decline in the number of inspections of foreign food production facilities, which are major sources of food-borne illnesses (Waldman

and Roberts, 2025). The decline in foreign inspections followed a 65% cut in Food and Drug Administration (FDA) staff who helped coordinate travel and budgets for those inspectors. (Administrative staff do not always represent 'bloat'.) Hiring enough inspectors has long been a struggle. In December, the FDA told consumer groups that current staffing was adequate, despite 470 out of 589 retained positions being unfilled, with 5 of 10 unfilled in the infant formula safety team (Todd, 2025).

Multiple agencies now face significant vacancies after DOGE cut positions, the government realised they needed many of those people back, and only some returned (Natanson et al., 2025). As of December 2025, some local National Weather Service

thousands of lawyers have opted to resign, with and without buy-outs, rather than adapt to the department's new norms and expectations. This includes the high-profile case of six prosecutors who quit when they were (1) asked to open a federal criminal investigation of the widow of a protestor who was shot and killed by ICE agents in Minnesota, and (2) informed that the actions of the ICE agent would not be investigated for possible violations of federal law (Londoño, 2026).

According to the American Bar Association, applications to fill empty Department of Justice positions have 'plummeted' in recent months, leaving the department seriously understaffed and struggling to fill vacancies (American Bar

... Trump made considerable progress towards eroding the professional, non-partisan federal civil service and transforming it into something resembling a president's personal staff.

offices were reporting 38–42% vacancy rates for meteorologists, scientists and other technical experts whose work is critical to providing communities with timely, accurate warnings of potentially deadly weather events (Mellen and Natanson, 2025). At the National Nuclear Security Administration, even after the employee call-backs mentioned earlier, the combination of buy-outs and firings caused significant losses of critical expertise in this 'chronically understaffed but critically important agency', including experts in highly sensitive fields such as the secure transport of nuclear materials, the construction of reactors for nuclear submarines, and safety standards for nuclear warhead assembly (LaFraniere, Kim and Tate, 2025).

Looking ahead, deteriorating employment conditions raise concerns about the government's future ability to hire and retain needed workers. At the Department of Justice, for example,

Association, 2025). This marks a sharp change from the past when large numbers of top law school graduates competed for coveted positions at the department.

Trauma, anyone?

From the perspective of Office of Management and Budget director Russell Vought and probably many others in Trump's orbit, every aspect of the bureaucratic purge, including the errors, can be viewed as a tremendous policy success. In a 2023 speech at the Center for Renewing America, Vought famously said, 'We want the bureaucrats to be traumatically affected. When they wake up in the morning, we want them to not want to go to work because they are increasingly viewed as the villains. We want to put them in trauma.' He reaffirmed this goal in a 2024 interview with Tucker Carlson on 18 November: 'Yes, I called for trauma within the bureaucracies.' And the evidence suggests he got it.

Public opinion

The public is feeling the effects. Comparison of poll numbers in March and September 2025 shows a significant increase in people answering ‘Yes’ to the question, ‘Do you know anyone personally who has been impacted by the Trump administration’s cuts to the federal government?’, from 29% to 46%. Roughly 60% of younger adults, aged 18–34, answered ‘Yes’ compared with 33% of respondents 65 and over in September. Most of the effects cited were negative, including people losing jobs or access to benefits, while some respondents cited positive effects such as reducing waste and lowering prices. Close to half (46%) of respondents said the cuts had made their lives worse; 33% said the cuts made their lives better (Partnership for Public Service, 2025b).

A *Washington Post*–ABC News–IPSOS poll in October found that 63% of respondents ‘disapprove’ of ‘the way

Donald Trump is managing the federal government’ and 57% thought he is ‘going too far’ in ‘laying off government employees to cut the size of the federal workforce’ (Clement, Balz and Ba Tran, 2025).

Conclusion

Although presidents have exercised considerable legal authority over the federal civil service, for better and worse, over the past 100-plus years, ‘bipartisan respect for the merit system’ and the principles of professionalism have largely restrained them from abusing the system (Bednar, 2026). Until the Trump era.

In the first year of his second term, Trump made considerable progress towards eroding the professional, non-partisan federal civil service and transforming it into something resembling a president’s personal staff. He appears to have advanced further on that battlefield in 2025 than in all four years of his first

term. At the same time, his slash-and-burn, shock-and-awe methods have invited serious rebukes from some of his loyalists, undermined the performance of core governmental functions, rattled the public, and forced some reversals. What happens next depends on the stamina of state officials, federal workers unions and civil society institutions, as well as the professionalism of judges and the results of the 2026 mid-term elections.

¹ ‘Feds’ is a common nickname for federal workers. It is not pejorative.

² One notable exception is Immigration and Customs Enforcement (ICE) funding, where members of Congress sharply disagree.

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Daniel J. Fiorino

The Trump Administration and Environmental Policy, One Year in

Abstract

President Donald Trump's administration delivered a tumultuous year for the United States in 2025. These changes were most obvious for climate change, where Trump cancelled Joe Biden's policies, withdrew from global organisations and agreements, and destroyed scientific capabilities at federal agencies. The administration eliminated environmental justice efforts across the government and acted under the Clean Air Act and Clean Water Act to increase public health risks while favouring business. These are the main changes, but lost expertise and cuts in capacities are not encouraging. The Trump administration is attempting to transform the federal role in environmental protection.

Keywords climate change, pollution control, government capabilities, scientific quality

One year has passed since Donald Trump and his administration took office. This has been a tumultuous year for the United States, one that led to clear damage for US capabilities in science and technology, the

independence of the federal civil service, and trust in government. The Trump administration withdrew from a range of multilateral agreements, abruptly closed global assistance programmes (including the Agency for International Development),

insulted European and Canadian allies, and broadly reduced the federal government's capabilities to deal with multiple issues. At the same time, the administration, using its congressional majorities in the House and Senate, ran up the federal budgetary deficit to unprecedented heights while cutting social safety net programmes.

Amidst all of this tumult, it was difficult to lose sight of the Trump administration's effects on US environmental policy. Roughly one year ago, I presented in this journal my expectations regarding the effects of the Trump administration (Fiorino, 2025). Events of the last year allow me to reflect on those expectations and assess what the impacts of this administration have been.

I expected one year ago that the administration's most significant harm would be to climate policy. This is partly because the US had not adopted clear legislative authority (such as the Clean Air Act or Clean Water Act) and the administration would not face legal constraints. It was also partly due to the hostility of the Trump administration to any form of climate mitigation. This hostility flows from many sources. The demands of the clean energy transition,

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and the required transformations in agriculture and other economic systems, posed an ‘inconvenient truth’ for an administration dedicated to immigration enforcement, tax cuts and expansions of executive power. Beyond this, the Trump administration is one based on right-wing populism, and such populists are suspicious of multilateral problem solving and scientific expertise, both of which are essential for making progress on climate mitigation. The Republican Party has an economic and regional affiliation with the fossil fuel industry, and for the last decade it has been a source of climate denial. For these reasons, the administration has been hostile to mitigating the causes of climate change.

The Trump administration has indeed focused its deregulatory efforts on climate change, because of the lack of legislation and for ideological and political reasons. It has trod slightly more cautiously on other aspects of the Environmental Protection Agency’s responsibilities, in large part due to existing laws that constrain its freedom to operate. But it has taken steps to pull back many Biden initiatives under the Clean Air Act. The United States Supreme Court did much of the heavy lifting for the Trump administration when it comes to removing authority over wetlands, which is favoured by property owners and agricultural interests. In other areas, such as chemicals and hazardous waste regulation, its impact will be felt in the lack of resources and expertise rather than outright policy changes, although some of those will occur. This article focuses on climate, air quality and water quality, with limited discussion of the EPA’s responsibilities for chemical safety, waste regulation and Superfund clean-up.

Looking back over the last year, it is not surprising that climate change was a target. Nor is it surprising that the Trump administration eliminated diversity and inclusion programmes, including environmental justice. The assaults on air pollution policies, given that they affect fossil fuels, were predictable, as was the near-total pullback from international organisations and agreements. What is surprising is the scope of efforts to destroy the scientific and policy capabilities of federal agencies. The damage to

The US lacks national regulatory laws for climate mitigation. Right-wing populism, along with the historical alliance of the Republican Party with the fossil fuel industry, make this an opportunity for the administration to leave its mark ...

government capabilities could be even more harmful than the policy effects. Indeed, the administration bragged about EPA cuts that saved \$750 million and reduced staff by 23% (EPA, 2025c). What they did not say was that this reduced the ability of the federal government to track and respond to problems posing threats to public health and the environment.

General EPA capabilities and priorities

Information about EPA priorities may be discerned from the agency’s strategic plans. During Trump’s first term, under administrator Scott Pruitt, the EPA strategic plan stressed a reliance on efficiency, implementing laws, and cooperative federalism (which under conservative presidents has always meant letting states do more of what they want). It is what one would expect from a politically conservative administration. Under administrator Michael Regan, the strategic plan stressed science, climate action, environmental justice, and enforcing environmental laws.

The strategic plan for Trump’s second term, under Lee Zeldin, is not expected to be issued until February 2026. However, signs of what it might contain were evident

in February 2025 in an announcement titled ‘Powering the Great American Comeback’ (EPA, 2025b). It consisted of five ‘pillars’: (1) protecting clean air, water and land for all Americans (in line with usual EPA plans); (2) restoring American ‘energy dominance’ by cutting costs and expanding options for fossil fuels; (3) permitting reform, cooperative federalism and cross-agency partnerships; (4) making the US the ‘artificial intelligence capital of the world’; (5) protecting and bringing back auto jobs (making no connection to environmental impacts). Four of the five pillars thus have little to do with the EPA’s historical and legal focus on the environment; and although permitting reform is a bipartisan issue, this administration applies this goal to fossil fuels and not renewable resources.

The administration’s attitude towards climate change, despite the scientific evidence, is captured in a quote from Zeldin: ‘We are driving a dagger straight into the heart of the climate change religion to drive down the cost of living for American families, unleash American energy, bring auto jobs back to the U.S. and more’ (EPA, 2025d). The priority is deregulation and cost savings rather than environmental protection or the health of the American people. Although there is room for innovation in how the federal government approaches environmental protection (Fiorino, 2006), the goal of the administration is to reduce capabilities of the federal government to promote environmental quality, through both policy change and losses in institutional capacities.

Policies for climate mitigation

The US lacks national regulatory laws for climate mitigation. Right-wing populism, along with the historical alliance of the Republican Party with the fossil fuel industry, make this an opportunity for the administration to leave its mark (Fiorino, 2022). And they have. Policies of President Joe Biden’s years, embodied in laws like the Inflation Reduction Act and Bipartisan Infrastructure Law, were reversed as far as possible (Storrow, 2025). Scores of grants made under these laws were clawed back. The administration has challenged California’s authority to set more stringent vehicle emissions standards,

established in what later became the Clean Air Act of 1970. President Trump pulled the US out of the Paris Climate Agreement, as in his first term. On top of all of this, the administration proposed to reverse the endangerment finding which concluded that carbon dioxide endangered public health and welfare (EPA, 2025e).

The endangerment finding is an EPA determination that flows out of the Supreme Court's decision in *Massachusetts v EPA* in 2007. A long-standing legal issue had been whether or not the Clean Air Act gave the EPA authority to regulate carbon dioxide. In 2007, the Supreme Court decided that the EPA did have that authority if it determined that carbon dioxide endangered public health and welfare, which is the standard for regulating pollutants in the law. Once President Barack Obama took office in 2009, the EPA proceeded to finding that it did endanger the public's health and welfare and created a regulatory programme for reducing emissions from coal-fired power plants. Known as the Clean Power Plan, this got mixed reactions from the courts and was cancelled when Trump came to office in 2017. Although there was pressure to withdraw the endangerment finding in Trump's first term, it was not acted on.

In his second term, Trump felt no such reservations. In late July 2025, the EPA proposed to rescind the finding. This would undermine the EPA's authority not only to set emission standards for stationary sources like coal plants but also regulate motor vehicles, including by future administrations. Rescinding the endangerment finding is an action that even many business firms find goes too far, given concerns about the increased likelihood of successful litigation if federal action is taken off the table and the prospect of having far more state-level variation (Zraick and Friedman, 2025).

President Trump also reinforced a commitment to fossil fuels. Indeed, his goal appeared to be to increase emissions as much as possible. On his first day in office, 20 January 2025, he issued several executive orders. One pulled the US out of the Paris climate and other global agreements 'that do not reflect our country's values' as the administration sees them (White House, 2025b). Another, titled 'Unleashing

The Clean Air Act allows exemptions if an alternative technology is unavailable or it protects national security interests of the US ...

American energy', contained a number of provisions for encouraging fossil fuels and hampering electric vehicles and energy efficiency (White House, 2025c). Yet a third, on 'Declaring a national energy emergency', discouraged renewables and opened federal lands to more oil and gas exploration (White House, 2025a). Together, these orders give clear priority to fossil fuels, which account for most air pollution and three-quarters of global carbon dioxide emissions.

In January 2026, Trump announced that the US was leaving the United Nations Framework Convention on Climate Change (UNFCCC), which had stood for 33 years as the global approach to dealing with the issue (Millman, 2026). He also announced that the US would withdraw from the Intergovernmental Panel on Climate Change (IPCC), the global body for assessing scientific evidence and policy, and 60 other global organisations or agreements.

These actions, along with withdrawal from the Paris Agreement, will damage international efforts to deal with climate change. The US contributed about 20% of the UNFCCC's core budget. When the US stopped contributing a year ago, Michael Bloomberg filled the funding gap (Sengupta, 2026). The president's authority to revoke a treaty ratified by the Senate is unclear. Nor is it clear legally if the Senate would have to ratify the UNFCCC treaty if a future president decided to rejoin. The

implications for global efforts are uncertain, but when the largest historical emitter of greenhouse gases withdraws from an agreement that authorises the process for reducing those emissions, it will not be good. What does seem to be clear is that the US will miss opportunities to influence future negotiations and participate in global efforts to develop innovative technologies.

The Trump administration has acted to impede the development of renewable energy and rescind energy efficiency standards. Although electricity demand is expected to rise 32% by 2030, about half of which is due to data centres, the administration has cancelled wind and solar projects and made permitting of such energy resources difficult (Groom, 2025). It adopted measures to extend the life of existing coal plants, rescind the energy efficiency standards for vehicles and appliances, and terminate government research on climate science and policy (Frazin, 2025).

Air and water pollution

The EPA's responsibilities have historically focused on air and water pollution control. Because laws exist for controlling these issues, the administration has had less freedom than it has in climate change. Still, it has taken steps to reverse many pollution control actions of President Biden. One step that exposes communities to higher levels of air toxins are invitations to request exemptions from nine rules that set limits for air toxins like mercury from the synthetic organic chemical and iron and steel industries. The Clean Air Act allows exemptions if an alternative technology is unavailable or it protects national security interests of the US (EPA, 2025d); both are questionable justifications. The administration is also seeking ways to make the National Ambient Air Quality Standards less stringent. Based on scientific evidence, these are a cornerstone of the Clean Air Act (EPA, 2025f).

Other actions are directed at protecting the auto industry, although the actual motivation may be to protect fossil fuels. In addition to proposing to rescind vehicle emission standards as part of the endangerment finding, the Trump administration proposed to roll back fuel efficiency rules proposed under President

Biden (Domonoske, 2025). It is seeking to remove California's authority to issue vehicle standards more stringent than the federal government's, a provision that has been in place since the late 1960s. California and other states are suing the administration (Cal Matters, 2025). As part of this, Trump seeks to revoke the state's ban on sales of internal combustion vehicles by 2035.

On water quality, a cause for political conservatives in recent decades has been to protect property rights and agriculture. This objective was accomplished to a large degree by the Supreme Court in the decision *Sackett v EPA*. This ruling aimed to clarify a long-running dispute about who has authority to regulate the 'waters of the United States'. At issue was the scope of the federal government's authority over waters (often consisting of wetlands) that are wet for part of the year but dry otherwise and not directly connected to a river, stream or other waterbody. The Natural Resources Defense Council, admittedly an advocate for federal authority over wetlands, concludes, based on modelling, that 38–70 million acres of wetlands would be removed from federal authority (Natural Resources Defense Council, 2025). These wetlands, the NRDC argues, filter drinking water, reduce flood and drought risks and protect wildlife. With a Supreme Court opinion in hand, the administration revised regulations not to require federal permits for many wetlands. This meant politically conservative states could set their own policies; it would result in fewer wetlands being protected.

The threats to environmental policy posed by the Trump administration do not end there. It has also proposed regulatory changes under the Endangered Species Act that would give greater weight to economic over scientific considerations, which political conservatives have long sought. According to the *New York Times*, it may be possible to challenge an endangered species listing decision based on lost drilling revenues banned near critical habitat (Joselow and Einhorn, 2025).

This administration has also delayed wind projects, even when they are nearly complete. Again, vague national security concerns were cited as the justification (Associated Press, 2025).

More than half a century ago, the US made a commitment to environmental protection during the 'environmental decade' of the 1970s, with the passage of landmark laws and creation of national legal, scientific and technical capabilities.

Chemicals, hazardous waste and site clean-up

The Toxic Substances Control Act of 1976 is one of the few major environmental laws to have been substantially revised in recent years. In 2016, Congress passed the Frank R. Lautenberg Chemical Safety for the 21st Century Act. The administration announced plans to accelerate the pace of reviews for new chemicals and eliminate backlogs. The worry is that, in doing this, the EPA will not dedicate enough attention to health or environment risks. Although the administration has promised to allocate more resources to chemical reviews, it remains to be seen what its approach will be. Yet its dismantling of scientific capabilities across the government is not promising.

For hazardous waste, the Resource Conservation and Recovery Act limits what the administration may do, but it could use its discretion and budget decisions to undermine Superfund implementation. For Superfund, the administration has promised to expedite site clean-ups, but this may mean less clean-up given proposed budget cuts of over one half for 2026 (Farzan, 2025). My expectation is that

programmes not affecting the fossil fuel industry will be less threatened, but that the administration could underrate risks and devote too few resources to making its decisions.

Concluding thoughts

The Trump administration is attempting a major and enduring transformation in the federal government's role to protect the environment. Protecting fossil fuels is a major motivation, along with the near total emphasis on economics at the expense of environmental goals. With respect to climate change, the hostility to scientific expertise and to multilateral forums are also motivations, as we see in other countries with right-wing populist parties (Dirkx and Wettengel, 2024). There is a determined effort to scale back or even to remove the federal role in environmental protection and other aspects of American life (Gelles and Joselow, 2025). One sees in the justifications for these actions emphasis not only on protecting business and the economy from federal 'overreach' but on consumer freedom of choice. Indeed, justifications for deregulation of motor vehicle emissions and appliance energy efficiency standards often stress a goal of preserving freedom of choice. These policies are part of a broad effort to reduce the federal role in the economy. They reflect a short-term view of issues like climate change and outright hostility to scientific expertise.

In one sense, the Trump administration is taking the long view, at least in terms of the next four years. It is acting quickly, because nearly every action it takes will be challenged in the courts. With a more conservative federal judiciary, especially in the Supreme Court, the administration hopes it will receive favourable decisions that increase its range of discretion under existing laws. The sooner that decisions are made, the more likely it is that judicial decisions can be reached before the end of Trump's term. What is certain, as one environmentalist put it to the *Washington Post*, is that the administration is 'really trying to move fast and break things' (Spring, 2026).

A characteristic of right-wing populism is that it claims to protect 'the people' against the intrusive ideas favoured by

‘elites’. Right-wing populist parties generally are sceptical of climate mitigation. Yet this protection against intrusion undoubtedly will harm vulnerable communities and, at some point, the overall population. Whether this will succeed in the longer

term depends on public access to reliable information on environmental harm and on the vitality of American political processes and institutions. More than half a century ago, the US made a commitment to environmental protection during the

‘environmental decade’ of the 1970s, with the passage of landmark laws and creation of national legal, scientific and technical capabilities. Whether those capabilities endure and in what form will be decided by events in coming decades.

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Ecological Transitions

challenges and reform options for better Protected Area outcomes

Abstract

New Zealand's protected area network needs an ecological transition to meet the agreed goal of the post-2020 Global Biodiversity Framework under the UN Convention on Biological Diversity to protect at least 30% of its territory through ecologically representative and functional designations. This article examines key challenges and proposes three sets of policy reforms to enable such a transition: improving the current poor representativeness through boundary changes informed by contemporary scientific insights; simplifying designations to align protection strength with ecological contributions; and

replacing the current outdated framework for visitor access with an ecological zoning framework that serves as the basis for proportionate access rules, drawing on the precautionary principle of decision making. Together, these reforms can improve ecological outcomes, while enabling compatible human access to a greater extent than is currently possible. In contrast, current government proposals to radically change conservation legislation in 2026 move in the opposite direction, risking a lose–lose–lose outcome for nature, communities and international commitments.

Keywords protected area designations, ecological representativeness, Convention on Biological Diversity, proportional regulations, precautionary principle

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Introduction and context

Under the post-2020 Global Biodiversity Framework of the 1992 United Nations Convention on Biological Diversity, New Zealand is called to reassess its protected area networks in terms of structure, regulations and management practices. Each ratifying state is asked to contribute to the global target of, by 2030, at least 30% of lands and waters being protected through ecologically representative and functional systems of protected areas and equally effective instruments (Secretariat of the Convention on Biological Diversity, 2022, p.12). Target 8 further calls for reducing climate change impacts on biodiversity. These goals continue the convention's 2004 programme of work on protected areas, expecting states to carry out national gap analyses, informing a shift to representative systems (Secretariat of the Convention on Biological Diversity, 2004, p.9).

New Zealand's protected area network covers about 33% of its territory. Table 1 shows its structure and the spatial footprint of designations. The Department of Conservation oversees most designations. Only about 5% of protected areas are managed by territorial authorities or regional councils, under the 1977 Reserves Act, while 1% are privately owned areas managed under covenants. National parks dominate spatially, covering 11.6% of the country.¹ Stewardship areas cover 9.4% of the national territory but do not classify as specially protected areas, under the 1987 Conservation Act, because their biodiversity values are still to be assessed. This designation currently prioritises human uses, including activities extracting natural resources (grazing, forestry, beekeeping, energy production, mining) (Department of Conservation, 2024a – see discussion of concession categories and 'ability to harvest forestry'). Conservation parks occupy 5.7% of the country. Nineteen other designations account for just 5% of the country's area. Ecological areas – explicitly aimed at representing native ecosystems – make up only 1.48%.

The last column of Table 1 lists the legislative Act regulating each designation. In addition, the Wildlife Act 1953 establishes three other designations: wildlife sanctuaries, wildlife refuges and wildlife management reserves. However,

Table 1: Protected Area designations and coverage.

Designation type	Number	Share (%) in PA network	Legal instrument
National parks	13	33.40%	1980 National Parks Act
Stewardship areas	2,632	26.94%	1987 Conservation Act
Conservation parks	67	23.44%	
Scenic Reserves Type A	1,532	4.54%	1977 Reserves Act
Recreation reserves	427	2.59%	
Conservation purposes	72	2.11%	1987 Conservation Act
Ecological areas	44	1.48%	
Wilderness areas	3	1.26%	
Nature reserves	53	1.18%	
Government purpose reserves	265	0.44%	1977 Reserves Act
Wildlife management areas	7	0.24%	1987 Conservation Act
Scientific reserves	99	0.18%	1977 Reserves Act
Amenity areas	17	0.11%	1987 Conservation Act
Local purpose reserves	942	0.09%	1977 Reserves Act
Historic reserves	150	0.07%	
Sanctuary areas	7	0.04%	1987 Conservation Act
Scenic Reserves Type B	24	0.02%	1977 Reserves Act
Total – 'public lands'	7,354	98.13%	
<i>Private PAs with covenants²</i>	<i>1,015</i>	<i>1.86%</i>	
Total (32.93% of the country)	8,370	100%	

Source: based on Ministry of Foreign Affairs and Trade and Department of Conservation, 2013

they do not feature in Table 1 because they typically exist within the broader designations shown in column one and therefore do not add to the total size of the national protected area network. Other (typically dual) designations made possible by the Conservation Act 1987 are marginal strips and watercourse areas.

Despite its size, New Zealand's network has failed to halt biodiversity decline. Over 3,000 known native species remain threatened, while indigenous ecosystems continue to degrade (Department of Conservation, 2020). Some have argued that public and economic benefits are limited, while many iwi feel excluded by the outdated 'fortress conservation' model, restricting the co-governance expected under the Treaty of Waitangi. Overall, environmental, social, cultural and economic outcomes have been disappointing, reflecting legislative, planning, funding and organisational shortcomings.

In response, the government announced plans in late 2024 to 'modernise' the conservation legislation. The reform plan (Office of the Minister of Conservation 2025) has five components :

- governance of the network: proposes centralising decision making, reducing public input and increasing ministerial discretion over zoning and concessions;
- simplification of the planning system: eliminates regional management tools, introducing two layers only – a single National Conservation Policy Statement and basic 'area plans';
- business concession allocation: expands the range of methods, from reactive to proactive approaches such as tendering;
- concessionaire responsibilities: moves to a one-size-fits-all model, limiting the Department of Conservation's ability to tailor environmental regulations to specific zones, as currently allowed by law;
- land exchanges and disposals: justifications cite both conservation benefits and revenue generation for nature management and new tourism facilities. In Table 1, the designations highlighted in grey are not intended for inclusion in this policy option.

Legislative changes are scheduled for adoption in early 2026. While the proposed reforms emphasise economic flexibility, they risk deepening existing ecological weaknesses

if they are not guided by scientific evidence, international commitments and New Zealand's own policies, particularly the 2020–50 biodiversity strategy (*Te Mana o te Taio – Aotearoa New Zealand Biodiversity Strategy 2020*) and the National Policy Statement for Indigenous Biodiversity, regarding representativeness and ecological sustainability.

Objectives, conceptual framework and methodology

This article builds on a multi-year research programme³ applying multidisciplinary perspectives to examine the structural and policy barriers that prevent an ecological transition of New Zealand's publicly owned protected area system, consistent with the Convention on Biological Diversity objectives. It is guided by two

capture under-represented indigenous ecosystems. He also noted that protected areas are ineffective when they provide strong legal protection (such as national park designations) to areas already extensively represented across the network, while leaving rare, threatened or under-represented ecosystems outside, or under-protected through weak regulations (Kelly, 1980, p.66).

Drawing on Kelly's ideas and an extensive review of recommendations from scientists internationally (e.g., Dudley and Parish 2006) and in Convention on Biological Diversity agreements, it is argued that the ecological transition of protected area networks (including in New Zealand) should start with three reforms.⁴ These reforms may be undertaken consecutively, in the order outlined here, but would be more effective when designed

article outlines how a protected area reclassification approach could be implemented in New Zealand. As designation categories need to always define the values to be protected and/or the management objectives, regulatory frameworks may also need revision, to better align requirements with contemporary scientific concepts and societal expectations. The section following applies a conceptual framework developed in a previous publication (Dinica, 2022, pp.83–136) to suggest a way forward. By means of two brief case studies, it also illustrates how current regulations are designed and implemented inadequately, undermining an ecologically effective management of the respective protected areas.

- Transition to ecological zoning and regulation of protected areas, informed by science and the proportionality principle of precautionary decision making. This is discussed in section six.

The precautionary principle means that governments are expected to act to prevent serious or irreversible harm to nature or public health, even if some cause–effect relationships are scientifically uncertain. Whenever the irreversible loss of species, ecosystems or critical ecological functions is at stake, the strong or 'overarching' interpretation of this principle can be invoked, which incorporates the principle of proportional regulations. This posits that policy decisions should match the severity, likelihood and reversibility of environmental harm (see Raffensperger, Schettler and Myers, 2000). The idea of proportional precautionary decision making can also be applied to protected area designations, zoning and regulations. For instance, protected areas or zones within that are ecologically highly represented across the network could be awarded designations that are more permissive to human access, especially if such areas are assessed by scientists as resilient to climate change and other pressures.

Transitioning to a functionally representative protected area system

De jure, although New Zealand ratified the Convention on Biological Diversity in 1993, the Conservation Act 1987 and National Parks Act 1980 still lack explicit requirements for capturing a

... although New Zealand ratified the Convention on Biological Diversity in 1993, the Conservation Act 1987 and National Parks Act 1980 still lack explicit requirements for capturing a representative range of ecosystems.

objectives. First, it aims to clarify the core structural and regulatory obstacles undermining a transition to a more ecologically functional, representative system. Second, while analysing challenges, the article also outlines several reform options to support ecological transitions, in the realm of both designations and broad regulatory approaches.

In New Zealand, the public protected area network administered by the Department of Conservation and councils has historically been designated ad hoc, responding to protection opportunities, with little input from natural scientists (Thom, 1987; Norton and Overmars, 2012). This resulted in a network with poor ecological representativeness, as explained in the following section. New Zealand scientist G.C. Kelly pointed out this problem in 1980, recommending that protected area boundaries and locations be modified to

jointly and implemented within the same timeframe.

- Change the protected area network's physical structure to improve ecological representativeness: this could be achieved through the addition of land exchanges and, possibly, disposal of areas with highly represented ecosystems (if the network becomes too large for financial sustainability or social support). The current situation, existing initiatives and milestones for New Zealand are discussed in the next section.
- Re-evaluate whether the designation category awarded to each protected area reflects adequately its ecological contributions. This calls for the simplification of designation categories that have been made before (see Norton and Overmars, 2012, p.115) but have not been fleshed out. Section four of this

representative range of ecosystems. Only the Reserves Act 1977 (in section 3) defines a goal to protect ‘representative samples of all classes of natural ecosystems and landscape’. Spatially, reserve designations cover barely 5% of the national network. Some nature or scientific reserves (or zones within them) may also receive designations under the Conservation Act: for example, ecological and sanctuary areas. But such designations do not extend the area where representativeness is a leading designation criterion.

The general policies for national parks and conservation emphasise that protected areas must represent diverse indigenous ecosystems. They affirm that the national network should become a more ecologically effective conservation tool. But current government proposals aim to replace both general policies and all regional conservation strategies with a minister-controlled National Conservation Policy Statement. It is unclear whether the concept of functional representativeness will be central, or at least included, in the new policy.

In reality, scientists report a public protected area network with poor representativeness. Given the complexity of nature, ecological assessments are often made at multiple, complementary scales. Table 2 presents a high-level overview, based on the concept of ‘land environments’ (Leathwick et al., 2003). This incorporates climatic and geographic criteria to show how much of the remaining indigenous cover has some level of protection in the public conservation lands. For New Zealand, scientists argue that maintaining functionality requires protecting at least 20% of the remaining extent of an ecosystem (Walker, Price and Rutledge, 2008, pp.10–11). Below this threshold, species diversity and ecological health start deteriorating exponentially, leading to locally irreversible ecosystem loss. Public deliberations are needed on what constitutes ‘adequate representation’, and on the threshold between moderate and high representation. The thresholds for the categories in Table 2 are suggested to support discussions throughout this article.

The patterns of biodiversity protection under the current network reveal strong biases. Using more familiar names for ecosystems, assessments across multiple

Table 2. The inclusion in Protected Areas of the original indigenous cover, per land environment (macrolevel ecosystem classification⁵)

Types of Lands Environments New Zealand	Representation of indigenous biodiversity
Highly represented land environments	
Permanent snow and ice	99%
Southern Alps	96%
Ultramatic soils	93%
Western South Island Foothills and Stewart Island	81.9%
Central mountains	77%
Moderately represented land environments	
Western South Island recent soils	45.4%
South-eastern hill country and mountains	24%
Central dry foothills	22.25%
Northern hill country	22.1%
Central, sandy recent soils	21.3%
Central hill country and volcanic plateau	20.1%
Under-represented land environments	
Central upland recent soils	16.7%
Southern low lands	7.3%
Northern recent soils	5.2%
Northern lowlands	4.8%
Central poorly drained recent soils	1.86%
Central dry low lands	1.2%
Central well-drained recent soils	1.1%
Western and Southern North Island lowlands	0.95%
Eastern South Island Plains	0.65%

Source: based on Leathwick et al., 2003

reviews indicate that ice, alpine and montane environments are highly represented, largely due to their location within large national parks. In contrast, wetland, lowland, and dry and coastal ecosystems are under-represented (Awimbo, Norton and Overmars, 1996; Kelly, 1980). Table 2 shows that nine ecosystems are severely under-represented, while four are only minimally represented (20–22% protection). These disparities indicate that the network remains ecologically unbalanced.

Scientific and policy programmes to improve representativeness

Historically, scientists in New Zealand have had limited influence over the selection and delineation of protected areas. In the early 1970s, Forest Service scientists proposed the designation of 112 ecological areas,⁶ covering 1.29% of the national land area, based on ecological and scientific criteria (Norton and Overmars, 2012). This initiative aimed to address the evident under-representation of key

ecosystems – particularly wetlands, coastal and low-lying environments, and tussock grasslands. However, progress has been slow. Half a century later, New Zealand has only 113 ecological areas, a designation introduced under the 1987 Conservation Act, prioritising ecological values.

The political acceptance of the ecological representation clause in the 1987 Act is widely attributed to G.C. Kelly, a pioneering New Zealand scientist who advocated for a nationwide biological survey of flora and fauna communities. His vision was to inform the identification and correction of representation gaps in the country’s protected area network (Kelly 1980). Kelly’s ideas were partially taken up through the Protected Natural Areas Programme, initiated in 1983. Under this programme, the Department of Conservation and councils commissioned ecological surveys to guide the identification of recommended areas for protection and priority areas for protection. The programme employs an ecological land classification system (applied

nationally, not only across protected areas) that distinguishes among 68 ecoregions and 286 ecological districts (see McEwen, 1987). However, by 2004 only 104 ecological surveys had been completed, leaving many districts unsurveyed (Wildland Consultants 2004).

Despite its potential, the Protected Natural Areas Programme has never been formally adopted as policy, and only some of the recommended areas for protection have received formal designations. In 2001, Bellingham reported that only 13% of the recommended areas were given designations (generally as ecological areas) or became protected through covenants with land owners/users (Bellingham, 2001, p.13). As of now, there are no publicly available updates, detailing any progress with ecological surveys or new legal

The early 'sample' approach embedded in legislation and the Protected Natural Areas Programme to improve representativeness reflects a reductionist and largely static conception of nature, akin to an 'open-air museum' model. This approach is not aligned with the more dynamic, functional understanding of ecological representation required under the Convention on Biological Diversity and embraced by contemporary science. Operationalisations of representativeness still vary across scientific advisory studies conducted for, and by, the Department of Conservation and councils, as do the complementary ecological criteria used to identify new protected areas.⁷ New Zealand therefore needs a national strategy to enhance the ecological performance of protected areas, including a single,

explore public concerns and preferences regarding protected area boundaries, designation types and regulatory approaches.

Improving the designation framework: from ad hoc to a science-informed, streamlined approach

As noted earlier, in New Zealand the designation categories given to areas have seldom reflected their full range of biodiversity values (Thom, 1987; Kelly, 1980; Norton and Overmars, 2012). This resulted in designations – such as scenic reserves, recreation reserves, amenity areas or stewardship lands – of areas that are ecologically under-represented and which offer many biodiversity values. A consequence has been an under-regulation of many protected areas, because the legal protection mandates do not prioritise the protection of (all) ecological values over human-centric values, such as recreation, tourism, scientific research, education, agriculture, energy production and so on.

The proportionality principle of precautionary decision making could be applied to re-categorise designations so that each area receives a designation that properly reflects a comprehensive analysis of its (current and potential) contributions to a representative and functional protected area system. A suitable designation needs to reflect both:

- an appropriate prioritisation of nature protection (the vertical axis of Figure 1 maps possible prioritisation types); and
- a legal mandate that reflects the protection strength warranted (as suggested along the horizontal axis of Figure 1).

In a previous publication, I suggested that a science-informed prioritisation of ecological values and objectives should be at the heart of a simplified protected area classification, distinguishing three categories (Dinica, 2022, pp.242–5):⁸

- ecological protected areas (EPAs), prioritising ecological protection over anthropocentric uses and values;
- heritage protected areas (HPAs), balancing nature and specific anthropocentric uses such as recreation, tourism and non-extractive land uses (this may involve an adaptive

Timely and inclusive public dialogue should ... be undertaken, co-led by mana whenua, to explore public concerns and preferences regarding protected area boundaries, designation types and regulatory approaches.

protections based on the Protected Natural Areas Programme. The Department of Conservation does not seem to have a strategy to improve representation. New Zealand's fifth national report to the Secretariat of the Convention on Biological Diversity noted a 4.2% expansion of the national network between 2004 and 2012. However, this expansion exacerbated existing imbalances, as it primarily added well-represented ecosystems – mainly through the reclassification of stewardship lands from pastoral tenures (Ministry of Foreign Affairs and Trade and Department of Conservation, 2013, p.42).

Milestones towards better representativeness

A first milestone for New Zealand is a refresh of its scientific programmes.

contemporary operationalisation of 'functional representativeness', applied consistently by scientists, authorities and stakeholders. This strategy should include milestones with targets, and guide amendments to all relevant laws and policies to incorporate requirements for protected area representativeness.

For implementation, the government must provide adequate funding for land acquisitions and exchanges. Legislation should be amended to facilitate land exchanges without requiring prior disposal. Changing protected area boundaries is likely to be sensitive, as public trust is low that land disposals will be at least matched by acquisitions of under-represented, rare and vulnerable ecosystems. Timely and inclusive public dialogue should therefore be undertaken, co-led by mana whenua, to

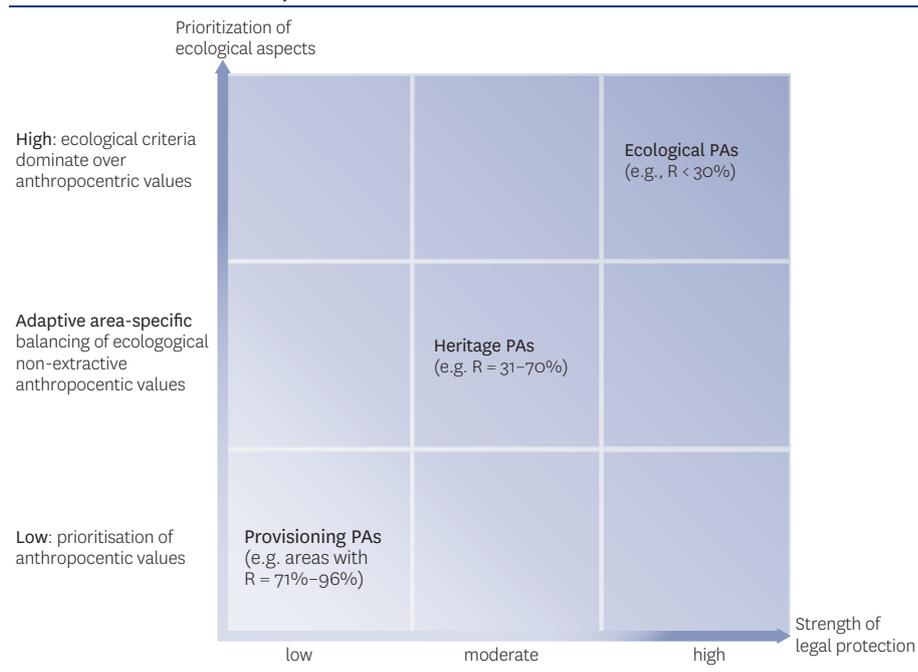
prioritisation of values, on a case-by-case basis); and

- provisioning/ecosystem service protected areas (PPAs), prioritising anthropocentric uses, including some extensive human access, such as minor settlements, and sustainable resource use. Such areas form the bulk of protected areas in Europe and other continents with ancient habitation (Worboys et al., 2015).

Based on that broad classification, I suggest that, in New Zealand, areas containing the ecosystem types listed in the bottom five–seven rows of Table 2 could be protected under ‘ecological protected area’ designations, prioritising the care for the area-specific ‘constellation’ of eco-values and eco-objectives that scientists deem feasible. For them, the authority to approve and revoke designations would rest with Parliament, for higher legal security. In contrast, areas with ecosystems listed in the top five rows of Table 2 may be reclassified across all three categories.

Taking the Southern Alps land environment as an example, of which 96% is currently captured, mainly by national parks, and applying the reclassification approach shown in Figure 1, up to 30% of these areas could be designated as ecological protected areas – an approach similar to that applied to under-represented ecosystems. Scientists would advise on the most desirable locations and boundaries of the new designations. Other areas – say, up to 40% – of the extent currently captured by conservation lands could be designated as ‘heritage parks’, for moderate access and use of natural resources. For this category, authorities would have some discretion to adaptively balance ecological, social, cultural⁹ and economic values. For instance, if climate or other pressures deteriorate habitats or key ecological processes in the ecological areas protecting the same ecosystem type (or comparable sets of eco-values), zoning or access conditions in relevant heritage parks may change, to strengthen the support of eco-values. This way, heritage parks may serve as buffer tools for the ecological areas, preserving the same ecosystem(s). Their approval and delisting would rest with entities able to provide some protection from the unreasonable exercise of political discretion to the detriment of

Figure 1. Recategorizing Protected Areas across an ‘ecological – human benefit’ spectrum



nature protection. For example, their designation may require the approval of both Cabinet and the New Zealand Conservation Authority, or other institutional arrangements that would offer a legal protection of moderate strength to that designation category, as suggested in Figure 1.

The remaining areas could be designated as provisioning/ecosystem service protected areas. In this example, they would represent the remaining 25% of the Southern Alps land environment, ideally in areas resilient to many possible pressures. Such designations would emphasise the benefit to communities from ecosystem services, permitting sustainable resource use (other than mineral or fossil-fuel extraction), or even small settlements that are sustainably built and managed. This focus could apply to all or selected zones within the area.

Regulations and operational management would still aim to maintain the area’s eco-values of interest, ensuring that social and economic activities in the region contribute to their protection. For provisioning protected areas, suitable eco-objectives might include ecosystem rehabilitation, adaptation of biota to climate change, and enhancing landscape coherence and connectivity. These areas could sustain essential ecological functions and services at broader scales, while

enhancing biome representativeness across the conservation network. To ensure accountability and public support, their designation and revocation could be placed under the joint jurisdiction of the minister and relevant conservation boards. Public deliberations and co-production with mana whenua would be needed to assist decisions on reclassifying protected areas based on a simpler designation framework, underpinned by the proportionality principle of decision making, as proposed here, ensuring that reforms have both scientific evidence and social legitimacy.

Improving the range and consistency of nature-protection mandates

Transitioning protected areas to become functionally representative systems requires also the protection of the full range of ecological values that may be present in the managed areas, irrespective of their prioritisation or level of legal protection. Previous publications suggested widening the protection mandates for some or all designation types, as most areas offer multiple ‘conservation values’ (e.g., Kelly, 1980; Cessford and Dingwall, 1999; Norton and Overmars, 2012). But specific proposals on how to organise them in a policy-friendly format are still scant in the wider international literature.

In a previous publication I developed a framework I call the Spectra for the

Ecological Regulation of Protected Areas and Tourism (SERPAT) (Dinica, 2022, pp.91–113). The SERPAT framework synthesises insights from contemporary scientific literature and international biodiversity agreements into an ecological module, comprising two regulatory dimensions. The first concerns the ecological values targeted for protection, distinguishing among four main categories:

- *ecological structures* – evaluations may assess which aspects of nature are prescribed for protection: genetic diversity, species diversity and/or ecosystem diversity;
- *key ecological processes* – here protection may refer to functional processes (energy flows, biogeochemical cycles, food chains), spatial scales (local, regional, global) or process types (abiotic, biotic, mixed processes);

under climate change; and ecological renovation (i.e., introducing new ecosystems when rehabilitating the original ones is unfeasible).

Several Department of Conservation scientists recommended that the department develop a new regulation approach by complementing the visitor-focused zoning frameworks (especially the Recreation Opportunity framework) with a mapping of ‘environmental assets’, to be achieved by mapping the ‘spatial distributions’ of ‘key conservation values’ (Cessford and Dingwall, 1999, pp.1–3, 12). While the authors did not use the term ‘ecological zoning’, they did provide key ingredients for it. The SERPAT framework expands on their recommendations, suggesting that the management plan applicable to a protected area designation should use only one ecological zoning

often prescribe different sets of eco-values and eco-objectives for the same designation, despite expectations that hierarchical instruments should be coherent and consistent across regulatory levels. To illustrate these challenges of narrow and inconsistent mandates, two brief case studies follow.

Approaches in New Zealand and in the Westland and Kaimanawa parks

This section explains the provisions pertaining to eco-values and eco-objectives emerging from all instruments applicable to Westland Tai Poutini National Park and the Kaimanawa Forest Park. The two designation types were chosen because, as shown in Table 2, they have the largest spatial footprint in the public network. The current research project collected information on several national parks and conservation parks. These two parks were chosen for this article because they offer a balanced picture for protected areas in the North Island and South Island. The findings for the two parks are consistent with those for other designations, which will be reported in future publications.

Overall, as shown in Table 3, the lack of alignment among the planning instruments applicable to each park is striking, as is their limited integration of contemporary scientific concepts and international guidance on nature protection. Across all instruments, the prevailing ecological objectives still mirror early 20th-century priorities of preservation and restoration. In the New Zealand context, these remain relevant. However, so are the objectives of connectivity and landscape integration. Table 1 shows that some designations capture tens of very small areas (ecological areas, nature reserves), even hundreds of sites (scenic reserves, recreation reserves), undermining their functionality. These objectives are only explicitly included in the regional strategies and the Kaimanawa plan. The eco-objectives of biotic persistence to climate change and ecological renovation (which could be valuable from the standpoint of ecosystem services) are missing from all instruments.

With respect to eco-values, both the National Parks Act and Conservation Act embody a narrow and reductionist conception of species diversity, emphasising

There is a move from early species-focused protection towards a recognition of ecosystem diversity, ecological processes, critical ecosystem services and integrity.

- *critical ecosystem services* – requirements may regard safeguarding supporting services or the regulating services necessary for nature to sustain itself;
- *indicators of ecological performance* – with a focus on ecosystem integrity and ecological health.

For effective protected area regulation and practical management (e.g., pest and weed control), specifying only the ecological values needing protection is insufficient. Scientists recommend articulating also the accompanying objectives, which may apply to one or several related eco-values. The SERPAT framework incorporates seven ecological objectives: preservation (including through the ‘natural recovery’ of degraded areas); proactive restoration/rehabilitation; connectivity among protected areas; landscape integration with neighbouring public/private lands; biotic persistence

framework, for both human access regulation and practical management: this should clarify both the eco-values and associated eco-objectives, for each zone within the designation or for the designation as a whole (when it is small and ecologically ‘homogeneous’).

However, transitions to science-informed ecological zoning require a broader protection mandate in law and implementation policies, as well as greater flexibility for actors (authorities, management partners, and the public engaged in decision making) to define protected area-specific and zone-specific priorities. Currently, legislative and policy instruments do not require the protection of all the above-mentioned categories of eco-values and eco-objectives. This limitation constrains actors’ ability to articulate area-specific protection priorities. Moreover, different laws and policy tools

‘native plants and animals’ while neglecting genetic and ecosystem diversity. References to ecosystem diversity are important because this is strongly linked to the concept of representativeness. The 2020 West Coast Conservation Management Strategy refers to the importance of preventing the loss of ecosystem diversity, genetic diversity and ecological integrity. In addition, ecosystem diversity is also to be safeguarded through restoration/rehabilitation and improved connectivity. The 2014 Westland Tai Poutini National Park Management Plan does not provide an explicit mandate to safeguard ecosystem diversity. Its focus is on preserving or restoring species diversity, critical eco-services and local ecological processes.

The 2002 Tongariro/Taupo Conservation Management Strategy, applicable to the Kaimanawa Forest Park, expands legal requirements by highlighting the importance of preserving or restoring key ecological processes, ecosystem diversity and ecosystem health. However, the 2007 Kaimanawa Park Forest Management Plan adds to the Conservation Act a different, narrower range of prescriptions. It refers to preserving ecosystem diversity and critical eco-services, while restoring ecological integrity in degraded areas. Accordingly, the management plan requirements for neither park are consistent with the higher-level instruments they are supposed to give effect to.

Overall, the analysis shows a slow and uneven shift in regulatory eco-values. There is a move from early species-focused protection towards a recognition of ecosystem diversity, ecological processes, critical ecosystem services and integrity. To ensure a robust mandate for the functional representativeness of protected areas, these newer scientific concepts must be integrated into forthcoming legal and policy reforms. A more ecologically effective protected area system needs the legislation to require managing authorities to spatially identify the full feasible range of eco-values and associated eco-objectives, for each existing and potential designation. This helps inform decisions on: how to eventually reclassify protected areas based on a simpler framework, such as that suggested in the previous section; and how

Table 3: Summary of eco-values and ecological objectives reflected in New Zealand’s key conservation instruments

Instrument	Eco-values identified	Ecological objectives identified
Instruments applicable to the Westland Tai Poutini National Park		
National Parks Act 1980	Species diversity (‘native plants and animals’ only)	Preservation, Restoration/rehabilitation
General Policy for National Parks (2005)	Genetic diversity Key ecological processes Critical eco-services Ecological integrity	Preservation, Restoration/rehabilitation
West Coast Conservation Management Strategy	Genetic diversity Ecosystem diversity Ecological integrity Critical eco-services (recognised but not linked to objectives)	Preservation, Restoration/rehabilitation Connectivity
Westland Tai Poutini National Park Management Plan	Species diversity Critical eco-services Local ecological processes	Preservation, Restoration/rehabilitation
Instruments applicable to the Kaimanawa Forest Park		
Conservation Act 1987	Species diversity limited recognition for ecological processes	Preservation, Restoration/rehabilitation
Conservation General Policy (2007)	Genetic diversity Species diversity Key ecological processes Critical eco-services Ecological integrity	Preservation, Restoration/rehabilitation
Taupo/Tongariro Conservation Strategy	Species diversity Ecosystem diversity Key ecological processes Ecosystem health	Preservation, Restoration/rehabilitation Landscape integration
Kaimanawa Forest Park Conservation Management Plan	Species diversity Ecosystem diversity Critical eco-services Ecological integrity	Preservation, Restoration/rehabilitation Connectivity

to zone PAs ecologically and regulate human access better, based on the proportionality principle of precautionary decision making – the focus of the next section.

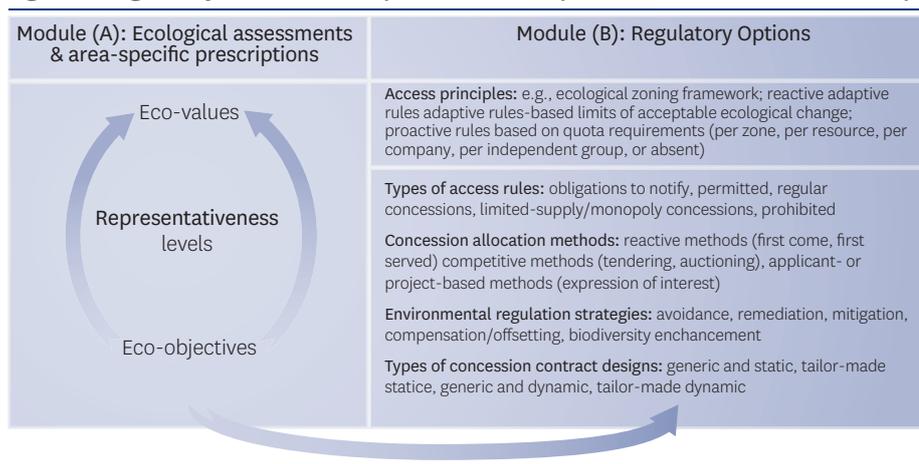
Transitioning to ecological zoning and proportional regulations

As foreshadowed earlier, New Zealand needs a new zoning system for protected areas that integrates operational biodiversity management decisions with human access regulations. To date, biodiversity management and access regulation have been zoned based on different frameworks. To regulate access, the Department of Conservation still relies on the Recreation Opportunity Spectrum developed in the United States in the late 1970s (Joyce and Sutton, 2009). This

framework differentiates zones within and across protected areas by considering pre-existing visitor facilities and infrastructure, as well as distance from access points. As a result, areas may be declared ‘wilderness’ and effectively overprotected due to remoteness, despite hosting ecosystems that are already over-represented across the network.

An ecological zoning framework would ideally apply across designation categories and incorporate multiple ecological criteria to capture nature’s complexity (Awimbo, Norton and Overmars, 1996; Walker and Lee, 2004). By applying the proportionality principle of precautionary decision making, the approach operates in a manner similar to that outlined above. Ecological zoning should require zone-specific regulations, with access rules being increasingly

Figure 2: Regulatory dimensions for protected areas (based on the SERPAT framework)



Source: Dinica 2022, 118

stringent where ecosystems are more threatened or under-represented within the network.

Accordingly, areas containing well-represented and resilient ecosystems could allow a wider range of compatible uses, such as recreation, tourism or sustainable agro-forestry. By contrast, under-represented or threatened ecological features would be zoned for stricter protection. This approach avoids both over- and under-regulation, aligning designations and zoning with ecological evidence.

As a regulatory scenario, consider a large protected area containing three ecosystem types, where two are already well represented across the national system (e.g., steep land and mountain podocarp forest), while one, such as a wetland, remains severely under-represented.

The wetland could be zoned as a ‘strict nature reserve’, with limits on access types and visitor numbers (including independent recreation). This could help safeguard key area-specific priorities for eco-values and eco-objectives, such as the restoration of ecological processes and habitat connectivity within and beyond the area. In contrast, some well-represented podocarp forest areas could be zoned for more extensive access (e.g., tourism unconstrained by visitation quotas). However, mindful of the precautionary principle, other podocarp areas may require strict reserve zoning to ensure that, at the network level, their effective protection meets the recommended minimum 20–30% threshold. Hence, an ecosystem type that is highly represented

across the network may be zoned and regulated differently for human access across protected areas to achieve an appropriate balance between protection and use.

The second column of Figure 2 shows the five regulatory dimensions or ‘spectra’ proposed by the SERPAT framework, and the regulatory options for each that authorities may choose from to craft contextually effective regulations¹⁰ (planning decisions, concessions, visitation quotas). Regulations are more likely to be contextually effective, and consistent with the proportionality principle of precautionary decision making, when they reflect the constellation of area-specific eco-values and eco-objectives, as well as the representativeness of the protected sites.

Conclusion

New Zealand’s protected area network reflects strong conservation intent but weak ecological design. Poor representativeness, narrow and inconsistent protection mandates, misaligned designations, and ecologically blind zoning undermine both its ecological effectiveness and feasible opportunities for human access. The reforms proposed here offer complementary pathways for an ecological transition. Implemented together, they could deliver a system that is more coherent, scientifically grounded and publicly legitimate. Achieving this requires political will, institutional innovation and sustained public dialogue – a shared effort to align conservation policy with the biodiversity crisis of the 21st century.

Particularly, the proposed reforms could substantially reduce the administrative burdens associated with zoning, concession allocation and non-commercial access. They would also enhance transparency for stakeholders and provide businesses with greater certainty around investment opportunities. These are outcomes the current government claims to seek; however, its approach instead emphasises ministerial discretion over planning and zoning, coupled with a radical deregulation of concession processes, and lacks an ecological rationale or action plan to safeguard the purported conservation ‘net benefits’ (Office of the Minister of Conservation 2025).

Limitations and future research

The analysis in this article focused deliberately on ecological design, designation logic and regulatory philosophies, rather than on governance arrangements or management actors. Biodiversity protection in New Zealand is not exercised solely by public authorities. It increasingly involves co-governance and co-management arrangements with mana whenua and other actors. However, these dimensions fall outside this article’s scope. The reforms analysed here are complex and require sufficient analytical space to be examined coherently. Future publications will extend this work, by examining how the proposed ecological reforms interact with evolving governance arrangements, including co-governance and co-management models, and by analysing the implications for public, Māori and private actors involved in protected area management. More research is also needed on how to improve social support, including from mana whenua, to improve the representativeness of the protected area network and its overall ecological performance.

1 For a map, see Phillips, 2009.
 2 The post-2020 Global Biodiversity Framework and other implementation decisions under the 1992 Convention on Biological Diversity focus primarily on publicly owned protected areas, as only states are parties to the Convention. Private protected areas (including those owned by Indigenous groups, NGOs or communities) may be incorporated into national implementation programmes, but only with the consent of private actors. At present, the government reports to the Convention secretariat of only on private protected areas for which landowners have entered into biodiversity protection covenants with the Department of Conservation or councils. Former national park Te Urewera and other Māori-owned areas managed for biodiversity protection (whether as a primary objective or not) are therefore not included in Table 1, as they are not reported in New Zealand’s submissions

(see Ministry of Foreign Affairs and Trade and Department of Conservation, 2013).

- 3 This programme was partially supported by funding from the School of Government Trust for empirical research conducted between October 2022 and November 2024. The author gratefully acknowledges this support; responsibility for all analyses and interpretations rests solely with the author.
- 4 In a previous publication I developed 11 sets of questions, to guide scholars and practitioners on how to operationalise such reforms. Chapter 1, which is freely available at the publisher's website, offers a thorough analysis of the international scientific literature and Convention on Biological Diversity documents on which the ideas draw (see Dinica, 2022, pp.2–30). Additional guidance and a research agenda pertaining to such reforms is available in chapter 9.
- 5 For brief descriptions of each land environment, see also Walker et al., 2004, pp.61–7.
- 6 As shown in Table 1, 'ecological area' is a designation recognised

under the 1987 Conservation Act, defining it narrowly and vaguely as follows: 'Every ecological area shall so be managed as to protect the value for which it is held' (article 21). Norton and Overmars (2012) argued correctly that an area is likely to have more than one conservation value and recommended amending the law to acknowledge multiple value (Norton and Overmars, 2012, p.115). The designation category of 'ecological protected area' proposed in this article defines these as areas that prioritise the protection of both the ecological values indicated by scientists as potential and present, and their associated ecological objectives (referring to how to safeguard those values). Such prioritisation is missing from the current legal definition of ecological areas in New Zealand, which are open to potentially destructive activities, such as mining.

- 7 For discussion on scientific debates surrounding the 'static' and 'functional' interpretations of representativeness, as well as the need for additional criteria to improve the ecological performance of the protected area network, see Walker and Lee, 2004.

- 8 The names of designation categories are offered as options. National public deliberations may settle on different names. Individual protected areas may even keep their own historical names, if this is important for local communities, or for marketing purposes. This is also practised in New Zealand. For example, the Kaimanawa conservation park is known as the Kaimanawa Forest Park, although legally this designation does not exist any longer.
- 9 Culture is understood here broadly, as people of all ethnicities have cultures. But some areas, or new designations within this category, would reflect Māori interests in lands and responsibilities under the Treaty of Waitangi.
- 10 For conceptual discussions regarding each regulatory spectrum (and options), see Dinica, 2022, pp.114–35. For the framework's application empirically to document regulatory problems and suggest improvement options for protected areas in New Zealand, Hawaii and Tasmania, see Dinica, 2022, pp.142–231.

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Jaimie Monk and Natalie Allen

Mapping New Zealand's Housing System

understanding how housing shapes wellbeing

Abstract

Housing outcomes in Aotearoa New Zealand are deeply intertwined with wellbeing, yet public discussion often focuses on isolated issues, rather than the housing system as a whole. This article offers a transdisciplinary, plain-language systems model to make visible the interconnections and trade-offs that complicate housing policy. Our Housing Outcomes and Multi-system Effects (HOME) model begins with a wellbeing lens by identifying how housing affordability, agency, place and house quality affect wellbeing, and

progressively builds outwards to show how economic, social and regulatory systems shape these foundations. By emphasising system-wide relationships rather than single-lever fixes, the model provides a tool for those working across housing, social policy, urban development and infrastructure seeking deeper insight into how New Zealand's housing system operates and where opportunities for more effective policy and practice may lie.

Keywords housing, wellbeing, systems thinking, housing policy, inequality

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Housing is central to wellbeing and economic functioning in Aotearoa New Zealand, yet it has become a persistent source of inequality and policy tension. Approximately one in four renting households now spend more than 40% of their income on housing (Statistics New Zealand, 2025), while poor housing quality continues to generate well-documented social and health impacts (Howden-Chapman et al., 2023; Riggs et al., 2021). These pressures affect not only where people live, but how they live, shaping consumption patterns, relationships, and the quality of neighbourhoods and communities. These burdens fall most heavily on low-income households, who face the greatest trade-offs between housing costs and other essentials (Urban Advisory, 2025), deepening cycles of poverty and limiting opportunities for social mobility (Statistics New Zealand, 2025). Wealth disparities between homeowners and renters have also become entrenched, with Māori and Pacific households disproportionately affected by poor housing quality and insecure tenure (Goodyear, 2017; Statistics New Zealand, 2023).

There is broad agreement that New Zealand's housing system is not working as it should. The more difficult question is why has it proved so difficult to fix? This article argues that housing outcomes are shaped by complex interactions between economic, social and institutional forces, yet policy debates often approach the system from a single perspective, in search of simple solutions. In response, the article introduces a model of New Zealand's housing system designed to make these interactions visible, anchored around the central question: how does housing enable wellbeing?

The model begins with wellbeing and the housing trade-offs households face, before layering in the economic, political and institutional systems that shape housing outcomes. It is intended to offer a shared analytical and practical framework for policymakers, analysts and practitioners working across housing, social policy, urban development and infrastructure. While prior work has mapped specific components of the housing system (e.g., Albsoul et al., 2024 on the economic system), to our knowledge this is the first

Across this history, structural forces such as colonisation, urbanisation and financialisation have entrenched inequities for Māori, Pacific peoples and low-income households ...

comprehensive map of New Zealand's housing system designed for a general policy audience.

This model was developed originally by Jaimie Monk for the Home Foundation, but this work has its origins in the Public Housing and Urban Regeneration programme, where the authors collaborated on research spanning the governance of public housing-led regeneration to understanding the diversity of tenant wellbeing. Through iterative refinement and cross-sector engagement, the model has evolved from a multi-disciplinary framework into a transdisciplinary tool (Moore et al., 2021) intended to support cross-portfolio reasoning and help decision makers anticipate tradeoffs, feedback loops and distributional consequences that are often obscured by single sector approaches.

Background

To frame the systems analysis in this article, this section summarises key features of New Zealand's housing context and housing as a complex system.

New Zealand's housing context

Housing has long been central to social stability and prosperity in Aotearoa New

Zealand. During the mid-20th century, state housing programmes provided affordable homes and embodied egalitarian ideals, with suburban stand-alone houses symbolising welfare provision and family wellbeing (Schrader, 2005). These initiatives coexisted with a growing private market which expanded alongside post-war urbanisation.

In 1974 the Housing Corporation of New Zealand was established, expanding inner-city housing projects and experimenting with new typologies. This broad consensus around housing as a social good shifted markedly in the 1980s, when neoliberal reforms curtailed the state's role, required housing agencies to operate on a profit basis, and led to the large-scale sale of public housing stock (Murphy, 2020). Housing provision was increasingly reframed around market efficiency rather than social equity, transforming housing into a primary investment asset and wealth-building mechanism. Combined with rising urban demand, these changes drove house price growth and entrenched affordability pressures and inequality.

At an aggregate level, housing affordability has also been shaped by macroeconomic and labour-market policy. Historically, New Zealand relied on high employment and stable wage growth as implicit pillars of social security, enabling households to afford housing, alongside high rates of home ownership (Castles, 1985).

By the early 2000s, governments began to reintroduce social priorities. The fifth Labour government (1999–2008) merged agencies to repackage the 'Housing New Zealand Corporation', influenced by Third Way philosophy which sought to balance social justice with economic efficiency (Nolan, 2010). Large-scale regeneration projects in Auckland and Wellington were announced, often structured as public-private partnerships, while the fifth National government (2008–17) later capped state housing numbers and expanded the role of community housing providers through the income-related rent subsidy. Affordability pressures intensified during this period and Labour's 2017 election campaign pledged to restore the state's role, leading to the establishment of Kāinga Ora – Homes and Communities,

an entity with an explicit wellbeing mandate. Much of that work has been paused under the present National government, which has overseen a large-scale review of Kainga Ora (English, McNeil and Allen, 2024) alongside a focus on legislative change to make it easier and cheaper to build through market mechanisms.

Across this history, structural forces such as colonisation, urbanisation and financialisation have entrenched inequities for Māori, Pacific peoples and low-income households (Paul et al., 2020). These inequities are compounded by systemic challenges: affordability has deteriorated as house prices have outpaced incomes (Nunns, 2021); supply constraints linked to restrictive land use planning, infrastructure deficits and slow construction responsiveness have created bottlenecks (New Zealand Infrastructure Commission, 2022; Household Technical Working Group, 2022); and renters continue to face poorer quality homes and higher health risks compared to owner-occupiers (Howden-Chapman et al., 2023)

Together these dynamics underscore that New Zealand's housing challenges reflect structural and systemic misalignment rather than simple scarcity, with policy interventions in one domain often generating ripple effects elsewhere.

Housing as a complex system

Housing systems are complex, adaptive structures shaped by interacting economic, social, political and cultural forces. Housing outcomes cannot be understood in isolation, but emerge from interconnected sub-systems such as markets, finance, planning, infrastructure and social norms, which interact dynamically over time (Paul et al., 2020; Murphy, 2020). A systems perspective highlights feedback loops: for example, rising house prices increase wealth for owners but simultaneously deepen affordability stress for renters, reinforcing inequality and shaping political responses. Systems theory therefore positions housing not as a discrete policy domain but as a dynamic system in which outcomes emerge from multiple interdependencies, producing non-linear effects across society (Pagani and Binder, 2023; Scottish Government, 2011).

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International research frames housing as a system with resilience and vulnerability dimensions. Housing outcomes are shaped by exposure to shocks such as financial crises, demographic shifts or natural disasters, which reveal interdependencies between physical dwellings, financial markets and social wellbeing (Wang et al., 2025). Earley (2021) similarly notes that housing institutions operate within hybrid governance contexts, where state, market and community actors share overlapping responsibilities.

This hybridity creates both opportunities for innovation and risks of fragmentation, requiring governance approaches that can coordinate across scales. Marsh et al. (2025) emphasise that housing connects directly and indirectly to health, education, labour markets, personal finances and social cohesion. Poor housing quality contributes to respiratory illness and educational disadvantage, while high housing costs constrain consumption and reduce labour mobility.

Systems perspectives also foreground the functions housing performs in supporting wellbeing. Pagani and Binder (2023) conceptualise housing as a socio-spatial system whose functions, such as providing stability, cultural identity or economic security, shape both residential preferences and dwelling forms. This lens highlights how mismatches between household aspirations and available

housing stock drive residential mobility and inequity. As a result, housing must be treated as critical infrastructure with long-term systemic impacts (Scottish Housing Investment Taskforce, 2025).

Resilience and adaptability are therefore central to understanding housing systems. Meerow and Newell (2019) argue that urban resilience requires asking 'resilience for whom, what, when, where, and why', recognising that housing systems embed trade-offs across time and space. Housing systems must thus be understood as dynamic, contested and political, where governance arrangements, investment flows and cultural values interact to produce uneven outcomes.

In Aotearoa New Zealand, systems thinking has been used to highlight how poor-quality housing interacts with health outcomes (Howden-Chapman et al., 2023; Riggs et al., 2021) and how supply constraints and planning frameworks amplify affordability pressures (Nunns, 2021; Household Technical Working Group, 2022). Māori and Pacific perspectives further emphasise that housing systems are embedded in cultural and historical dimensions, where colonisation and dispossession continue to influence tenure, wellbeing and equity (Penny et al., 2024).

Overall, the literature converges on three key insights: housing systems are non-linear and interdependent, with outcomes shaped by feedback loops across economic, social, and institutional domains; they are resilient yet vulnerable to shocks; and, in New Zealand, housing systems are deeply embedded in historical and cultural contexts, making equity and wellbeing central to any systems-based analysis.

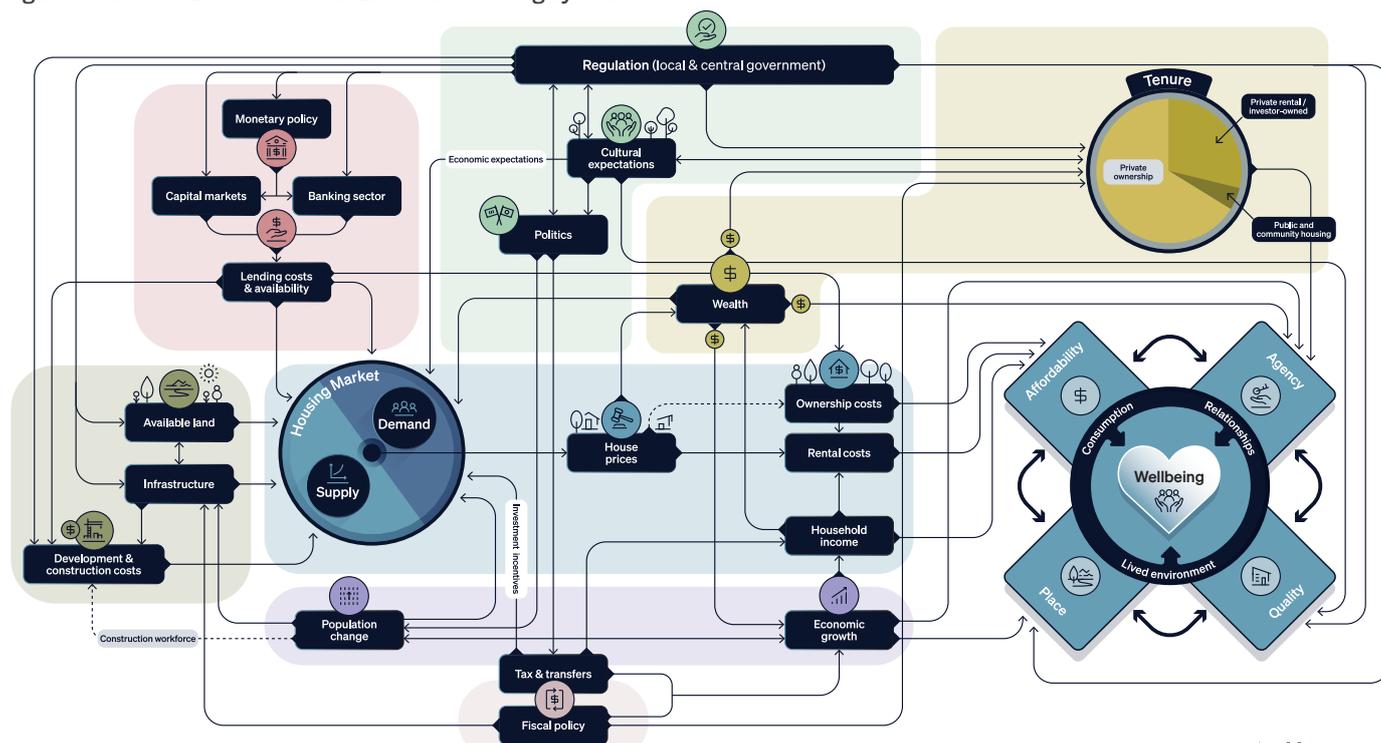
A model of New Zealand's housing system

Purpose and intention

This section will introduce the Housing Outcomes and Multi-system Effects (HOME) model of New Zealand's housing system (Figure 1), before explaining the central wellbeing framework and each of the eight sub-systems.

The HOME model is intentionally designed to strike a balance between simplicity and usefulness, including enough detail to be helpful, while not being unnecessarily complex. Many of the elements shown here could be expanded

Figure 1: The HOME model of New Zealand's housing system



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out into full systems in their own right; the model should therefore be considered an overview and starting point for understanding the system as a whole.

There are two key intentions built into the design of this model. First, the model is intentionally person-centred rather than house-centred. This contrasts with conceptualisations such as the housing continuum, which is organised around categories of dwellings or tenure. Here, the emphasis is instead on how homes share

the lives of those living within them. Homes are places for human relationships rather than simply shelter.

Second, the model is intended as a tool for understanding relationships between different parts of the housing system, not strictly as a causal diagram. Each connection shown has a degree of empirical grounding, although the strength of these relationships and the mechanisms that link them are often debated within the literature. The model's value lies in making explicit

the connections between the parts to see how actions in one part of the system can reverberate through others.

Arrows indicate direction of influence rather than causal certainty, with bi-directional arrows reflecting feedback loops; coloured groupings denote sub-systems, and dotted connections indicate indirect or mediated relationships.

How housing affects wellbeing

At the core of Figure 2 we have wellbeing. Wellbeing can be considered at an individual, whānau or wider collective level and has been chosen in this model for its conceptual flexibility. It can encompass objective outcomes such as material wellbeing and physical health, but also subjective experiences of life satisfaction, utility, belonging and security, and can be considered within a wider capabilities approach (Sen, 1999; Treasury, 2018).

Housing affects wellbeing through three interconnected pathways. Relationships or whanaungatanga captures how housing supports family stability and connection within households, families and neighbourhoods (Penny et al., 2024). Positive relationships are important for adult wellbeing, and especially for child development (Bronfenbrenner and Morris, 2007; Diener and Seligman, 2002).

Figure 2: Our housing and wellbeing framework



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Consumption relates to the share of income left over after housing costs, which shapes access to food, clothing, transport and other things important for wellbeing, such as the ability to financially support relatives, provide hospitality or to have holidays. The lived environment encompasses the physical location and qualities of homes and communities that influence belonging, health, safety and connection.

When an individual or family makes a housing decision, they typically make trade-offs, forming their own trade-off hierarchy (Allen, 2016), sacrificing on some elements of housing in favour of another they deem more important. A household with an elderly person may choose to spend more to live somewhere warm and dry, or a large multi-generational family may sacrifice location to find a home where they can all live together.

This wellbeing framework captures these trade-offs as they relate to four housing foundations: affordability, agency, place and quality. Affordability determines financial security and freedom of choice. Housing agency reflects individual and whānau ability to create the lives they want through housing. Agency encompasses security of tenure, but also the freedom to move for opportunities, or to live as desired within a home. Place connects housing to whenua and community, strengthens identity and includes access to employment opportunities, marae, and amenities like schools, transport and social services. Finally, house quality covers the adequacy, size and condition of homes that support health, accessibility and the ability to live in culturally appropriate ways in a home.

Ultimately, the fewer economic resources a household has, the narrower the set of housing options available to them and the greater the tradeoffs they must make. These constraints are not simply financial: limited income typically restricts access to secure tenure, reduces bargaining power within the housing market, and increases exposure to poor quality housing. Households with fewer resources often face heightened time and cognitive burdens, such as longer commutes, frequent relocations, or the need to secure accommodation at short notice. In addition, lower income households generally carry higher levels of risk, with

Migration and economic growth reinforce one another: growth attracts migrants, while migration increases labour supply, productivity and consumption, contributing to further growth.

less capacity to absorb rent increases, respond to changing employment conditions, or recover from housing shocks. Together, these constraints mean that tradeoffs between affordability, place, agency and quality are not freely chosen but structurally imposed, shaping wellbeing outcomes well beyond the question of housing costs alone.

Sub-systems within the model

The eight sub-systems described below shape housing outcomes by influencing the trade-offs households make between affordability, agency, place and quality.

The housing market and affordability

Each sub-system affects the others, but the economic system, driven by the housing market, provides a good starting point. The market is a balancing mechanism in a dynamic system translating pressures from supply and demand into house prices. When supply is constrained, demand pressures accumulate as rising costs; when supply is responsive, the demand for housing is met by builders and developers looking to generate profit and prices remain constant.

From within our wellbeing model, housing affordability is understood as the

ratio of housing costs to household income. Housing costs are defined broadly here as either rental costs (rent paid to a homeowner), or ownership costs, which are chiefly driven by mortgage costs, but also include rates, insurance and maintenance costs.

Rental costs in New Zealand are driven primarily by wage rates, or broader household incomes, and the cost of housing as a function of the relative supply and demand of dwellings (Bentley, Cassino and Ngo, 2023). An increase in house prices directly affects ownership costs for those entering the housing market or those buying a more expensive property who will have to take on a larger mortgage.

New Zealand has an unresponsive land and housing supply system, which is less responsive now than in the past (New Zealand Infrastructure Commission, 2022), meaning that when there is an increase in demand for housing, prices generally go up. The housing market directly affects wellbeing through affordability, while indirectly affecting agency, place and quality by influencing where households live and how stable their choices can be.

Wealth and tenure

Rising house prices also increase the wealth of current homeowners and this increases homeowners' agency, but deepens the barriers to purchase for first-home buyers, resulting in lower wellbeing for renters compared with homeowners (Blamey, Grimes and Gemmill, 2025). As housing wealth grows, demand for housing as an investment increases, creating a reinforcing cycle.

In a system where home ownership is the primary pathway to asset accumulation, access to ownership is strongly shaped by intergenerational housing wealth. Individuals whose parents own a home are 30% more likely to enter ownership themselves (Choi, Zhu and Goodman, 2018; Wold et al., 2024.), often earlier and with lower debt burdens. These advantages reduce exposure to market risk, widen location and dwelling choices, and increase resilience to income shocks. By contrast, households without access to intergenerational wealth must rely almost entirely on earned income while facing high rental costs, making it harder to save and

increasing the likelihood of long-term renting. Over time, tenure outcomes increasingly reflect inherited advantage rather than labour market participation alone, reinforcing inequality and shaping wellbeing across the life course.

Economic growth and population change

Housing demand is strongly influenced by economic growth and population factors such as net migration, demographic changes and household formation. Migration and economic growth reinforce one another: growth attracts migrants, while migration increases labour supply, productivity and consumption, contributing to further growth. However, New Zealand's slow housing and infrastructure supply response means population growth often translates into higher house prices in the places migrants want to live (Nunns, 2021). Economic growth boosts employment and household incomes, providing households with more income to spend on housing, but whether there is a net benefit to wellbeing is likely to depend on whether a household owns or rents their home. Rental prices are influenced strongly by wage rates, so if incomes are rising, rents are likely to follow suit (Bentley, Cassino and Ngo, 2023).

Economic growth can expand agency by increasing employment opportunities, borrowing capacity and location choice. It can also strengthen a sense of place by supporting investment in infrastructure and amenities, and the presence of services and public spaces that foster neighbourhood vitality and identity. However, the extent to which these benefits are realised depends on how growth is spatially distributed and whether rising land and housing costs displace existing communities.

The effect of population change on housing demand is shaped not only by total numbers, but by household structure and life-course dynamics, including family size, ageing, the number of parents parenting across two homes, and how many income earners are in households. In the current context, many families require dual incomes to cover housing costs, yet a substantial share of households with children are supported by a single adult. This creates a 'wellbeing squeeze', where the lack of a second income severely limits a household's

The absence of a comprehensive capital gains tax, combined with the relative security of housing assets, encourages investment in property over other investments.

agency and choice of place. Furthermore, demographic shifts such as the rise of multi-generational living arrangements, particularly for Māori and Pacific whānau, demand a more diverse housing stock than the traditional suburban stand-alone house.

Supply response

Changes in house prices are ultimately determined by how effectively the market can respond to changes in demand. Key enablers of supply response include the availability of land, the quality and quantity of available infrastructure, and development and construction costs.

There is strong evidence that the availability of land for development in New Zealand has been restricted, and this distorts the market (Household Technical Working Group, 2022). Removing constraints on building on land in urban areas through changes in zoning laws appears to constrain price rises and keep rents stable (Donovan and Maltman, 2025). However, assessments of these decisions often focus narrowly on market outcomes, with limited attention given to their effect on the wider housing trade-offs made by households or flow-on effects on wellbeing.

The infrastructure picture in New Zealand is mixed. New Zealand spends more than the median OECD country on infrastructure as a percentage of GDP but is

in the bottom 10% of high-income countries for the efficiency of that spend (New Zealand Infrastructure Commission, 2024).

Construction and development costs further shape supply. Higher input costs (including labour and building materials) generally translate into higher house prices, if all else remains constant. However, this is a somewhat bi-directional relationship as when the price of houses rises due to external factors, then there is an increased profit incentive to build.

An emerging but critical pressure on the housing system is the increasing frequency of natural hazards and the requirement for environmental resilience. These events do not just have an impact on wellbeing during a crisis; they create systemic ripple effects through various subsystems. For example, increased flood or seismic risk alters regulation through more stringent building standards and zoning restrictions. This, in turn, inflates development and construction costs and ownership costs via rising insurance premiums. For households, the threat of natural hazards can erode wealth and compromise the safety and quality of the lived environment, forcing difficult trade-offs between safety and affordability.

Financial system

The financial system plays a pivotal role in shaping housing outcomes in Aotearoa New Zealand. It not only channels capital into the housing market, but also sets the conditions under which households, investors and developers can access credit. Monetary policy, capital markets and the banking sector together determine the cost and availability of finance, influencing both demand and supply dynamics.

At the household level, the availability of mortgage credit is one of the most significant determinants of affordability and access. Periods of low interest rates and abundant liquidity encourage borrowing, expand purchasing power and stimulate demand, often leading to house price inflation.

For developers, the financial system shapes the feasibility of new housing projects. Access to development finance, construction loans and capital market instruments determines whether supply can respond to demand pressures. High borrowing costs or limited credit

availability can delay or cancel projects, exacerbating supply constraints.

Fiscal policy

Central to the housing system is fiscal policy and the tax and transfer system. Fiscal policy captures what the government chooses to invest in and how it chooses to fund this spending. Government investment in infrastructure such as transport networks, water and schooling supports the building of new housing. In some cases, the state can choose to build housing directly, particularly social and affordable homes that the private market under-supplies. These investments reflect a public interest in long-term social benefits beyond short-term financial returns and can be used to strategically develop urban environments. New public housing can provide direct wellbeing benefits through affordability, higher-quality housing and security of tenure. The state also steps into the gap to pay for the social harm caused by inadequate and unaffordable housing.

The tax system further shapes incentives within the housing market. The absence of a comprehensive capital gains tax, combined with the relative security of housing assets, encourages investment in property over other investments. This channels investment into housing, boosting demand and contributing to higher prices.

To compensate for unaffordable housing, the transfer system provides income support to low-income households through the accommodation supplement and the income-related rent subsidy. Other income support policies such as Jobseeker Support and Working for Families are also set at levels that need to account for New Zealand's relatively high housing costs. While these mechanisms provide short term relief, they operate as extractive demand-side subsidies, transferring public funds into an unaffordable housing market rather than resolving structural drivers of cost, with expenditure increasing consistently over time.

Social norms and cultural expectations

An often-overlooked aspect of New Zealand's housing system is the role of social norms and cultural expectations in shaping human behaviour and influencing demand for housing. New

The HOME model is intended as a practical sense-making tool for policymakers, analysts and practitioners working across housing, urban development, social policy and infrastructure in Aotearoa New Zealand.

Zealand has a long history of considering home ownership the idealised end point of a trajectory of tenure progression (Ryland, 2023) and the most appropriate way to build wealth for retirement, with our retirement income support settings set up on the assumption of home ownership (Saville-Smith, 2019). Social norms about density, acceptable quality, ownership structures and appropriate standards for landlords all shape what kinds of housing are considered desirable or legitimate. Finally, economic narratives have the power to shape economic expectations (Shiller, 2020). A strong narrative in New Zealand has been that house prices will continually rise, often backed by a normative assumption on the part of many public commentators that rising house prices are 'good' and falling prices are 'bad' (Davis, 2025). Together, these socio-cultural expectations can drive political decision making at the central and local government level and

have embedded a system that relies on increasing housing wealth for economic prosperity.

Political and regulatory system

Finally, the entire housing system is embedded within a political and regulatory environment that sets the rules for the entire system and reflects collective values and cultural expectations. Political institutions determine priorities for investment, taxation and welfare, while regulatory settings translate these choices into binding constraints and incentives. Planning and zoning rules are among the most influential levers, determining the availability of land, the form of the urban environment, and the location and density of development. Environmental regulations further shape what can be built, where and under what conditions, often balancing growth with sustainability and protection of natural resources. Building standards establish minimum thresholds for safety, durability and quality, ensuring that homes meet health and safety requirements, which all affect house quality. At the same time, regulations around development contributions and infrastructure levies influence the cost of new housing, with implications for affordability and supply responsiveness.

Importantly, regulatory frameworks have not always enabled culturally grounded housing models. For example, papakāinga development on Māori land has historically been inhibited by planning rules and resource consent requirements, which often did not recognise collective ownership structures and tikanga-based approaches to land use (Te Puni Kōkiri, 2025).

The financial regulatory system also plays a critical role. Macroprudential tools such as loan-to-value ratio (LVR) restrictions, debt-to-income limits and capital adequacy requirements are designed to safeguard financial stability but directly affect the cost and availability of capital. These measures influence both the demand for housing – by shaping household borrowing capacity – and the supply side, by affecting developers' access to finance.

Finally, the stability and predictability of the regulatory environment is crucial. Housing and urban development projects

often require long-term planning horizons and significant upfront investment. If rules are uncertain, subject to frequent change, or inconsistently applied, investor confidence can be undermined, slowing delivery and exacerbating supply constraints.

Discussion

Using systems thinking

The HOME model is intended as a practical sense-making tool for policymakers, analysts and practitioners working across housing, urban development, social policy and infrastructure in Aotearoa New Zealand. Rather than predicting outcomes or prescribing single solutions, it aims to support better decision making in a policy environment where housing interventions are often designed and assessed within institutional and functional silos. By representing the system as a whole, the model makes visible the trade-offs and feedback loops that can be obscured when decisions are taken within a single portfolio or time horizon. Importantly, it also highlights how these tradeoffs are distributed unevenly.

The model does not offer a single causal pathway. Instead, it provides a structured way to reason about interactions across the housing system, helping users to develop shared assumptions, frame policy trade-offs, and support dialogue between government, community housing providers, iwi and the private sector. It can also support a system-wide understanding of potential threats to the system, such as through the emerging importance of natural hazards.

Making trade-offs explicit

This systems perspective is particularly valuable because regulatory and fiscal interventions routinely generate effects beyond their immediate intent. For example, changes to zoning rules intended to preserve neighbourhood character can limit the supply of developable land, making urban land markets less competitive. The resulting scarcity raises house prices, increasing the wealth of existing homeowners while increasing rental costs for those who do not own. In this way, the benefits of character protections in one suburb may be offset by higher living costs for low-income families

By shifting the focus from individual policies to the interactions between them, a systems lens reframes New Zealand's housing challenge as one of coherence and alignment rather than of scarcity alone.

elsewhere, who must devote a larger share of their income to rent and will thus have less for essentials such as food or transport.

This example illustrates how regulatory decisions in one part of the system can generate unintended wellbeing costs in another. When similar decisions accumulate across multiple policy domains, these effects can compound over time, reinforcing affordability pressures and widening inequities. Any rule that makes homes more expensive to build or limits where they can be located will tend to shift those costs somewhere – onto tenants, first-home buyers, or the public budget through higher housing subsidies. Sometimes these rules serve beneficial purposes, such as environmental protection or heritage preservation, but without understanding the wider system effects it can be easy to do more harm than good. A systems perspective helps to surface these trade-offs, enabling more transparent and balanced policy choices.

Understanding policy options through a systems lens

A systems map also provides a structured way to understand policy options that

operate in different parts of the housing system. For example, an increase in the accommodation supplement may offer immediate relief to a household, but the model encourages users to look 'downstream' at how that intervention might eventually inflate rents if structural supply issues are not addressed over a longer horizon. In contrast, supply-side measures – such as infrastructure investment, planning reform or public housing construction – tackle the underlying structural imbalances but often involve longer lead times and higher upfront costs. Viewing these approaches together within a single system highlights their interdependencies and feedback loops, encouraging more coherent and coordinated policy development.

Showing the system as a whole, anchored around wellbeing, also helps to understand how households work within the system and make trade-offs to maximise their own wellbeing. While increasing the affordability of housing is central to expanding households' options, wellbeing benefits can be obtained through other mechanisms, such as increasing tenant protections to increase agency or regulation of rental housing standards to improve house quality. This focus on expanding the housing factors that maximise wellbeing allows a much broader set of policy options than a focus on transitioning households through tenure types as conceptualised in the housing continuum. In practice, expanding these dimensions of wellbeing can reduce the severity of housing tradeoffs, even where affordability constraints persist.

Limitations

While the model captures many key dynamics, it necessarily simplifies a complex and shifting reality. A primary limitation of any static system map is the difficulty in representing time and cumulative effects. There is an inherent tension in using a static framework to 'highlight time horizons'. While the model cannot *display* a timeline, it is intended to serve as a cognitive prompt for users to consider the long-term feedback loops that are often ignored in three-year political cycles. Housing outcomes in Aotearoa

New Zealand are not instantaneous; they unfold over decades and are shaped by intergenerational processes such as colonisation, land dispossession and wealth transfer. Consequently, this model cannot easily simulate the velocity of change.

The model's aggregate nature obscures significant regional differences across New Zealand. The pressures in a high-growth urban centre like Auckland differ fundamentally from those in a declining rural town, yet both are represented here through the same systemic nodes. Furthermore, while the model focuses on the housing system, it sits adjacent to other critical systems – such as healthcare, education and social service provision – that interact with housing and are equally vital determinants of wellbeing but remain outside the current scope of this specific map.

Conclusion

New Zealand's housing challenges are systemic, not singular. There is no silver bullet that can, on its own, deliver affordability or wellbeing. A systems approach encourages us to see policy levers as interdependent, and therefore addressing our housing challenges requires coordinated action across multiple domains, guided by a shared understanding of how housing connects to wellbeing. The systems model presented here offers a way to make those connections visible – to inform decisions that are balanced, transparent, and oriented towards long-term, equitable outcomes.

By shifting the focus from individual policies to the interactions between them, a systems lens reframes New Zealand's housing challenge as one of coherence and alignment rather than of scarcity alone. It shows that lasting progress depends not

only on new interventions, but on how economic, political and social systems work together towards shared wellbeing outcomes.

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Juliana Cesário Aragi, Sally Mackay,
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What Works in School Meals?

Policy lessons from school meal programmes in Brazil and New Zealand

Abstract

The Ka Ora, Ka Ako Healthy School Lunches programme has been operating for six years, feeding one quarter of New Zealand's students, with demonstrated early success; however, its future is not guaranteed. Brazil's National School Feeding Programme represents one of the largest and longest-standing food provision initiatives in the world, currently feeding all students enrolled

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in public schools, and has seen massive success in lifting children out of malnutrition; national food insecurity rates are now lower than New Zealand's. This study applied a policy analysis framework to compare the two programmes in terms of their content, actors, process and implementation context to distil key insights for New Zealand regarding building programme sustainability and legitimacy. We discuss how these two programmes evolved from different societal and governmental values, highlight mutual lessons to be learned, and provide insights for other school meal programmes worldwide.

Keywords school food, food policy, education, food systems, equity, public health

School meal programmes have been identified as one of the world’s largest social safety nets, considered essential for education, health and wellbeing, especially when mandatory and universal (Bedasso and Bundy, 2025). Evidence shows that they can reduce food insecurity and improve diet quality among students, as well as school attendance and educational performance (Forrestal et al., 2021; Smith, Lin and Guthrie, 2024; Wang et al., 2021). Internationally, school meal programmes are also one of the recognised priorities to improve the development of more resilient, sustainable and equitable food systems (Bandoni et al., 2024; Cohen et al., 2023; Rockström et al., 2025; United Nations Food Systems Coalitions, 2025).

The second largest school meal programme in the world is Brazil’s National School Feeding Programme (Programa Nacional de Alimentação Escolar – PNAE) (World Food Programme, 2025). PNAE has a 70-year history and, in 2023, provided school meals to more than 39 million students (FNDE, 2025a). In Brazil it is considered one of the most enduring and societally embedded public policies (Peixinho, 2013). Internationally, PNAE represents a benchmark for strong leadership and political stability, with notable commitments to providing universal free school meals to all students in public schools and purchasing food from local family farms (Brasil, 2009; McKerchar et al., 2021; World Food Programme, 2025).

Aotearoa New Zealand also has a school meal programme, a more recent one, which began in 2019 as a pilot programme and was expanded in 2020 to reach all students

in primary and secondary schools in the highest quartile of disadvantage. The Ka Ora, Ka Ako Healthy School Lunches programme is New Zealand’s largest investment in children’s nutrition to date, serving approximately 242,000 students (Ministry of Education and Social Wellbeing Committee, 2019; Ministry of Education, 2021). Its short history has been marked by uncertainty, with major changes in implementation methods and a substantial decrease in government investment in 2025 (Chote et al., 2022; Garton et al., 2023; Ministry of Education, 2024a).

As complex social policies created and maintained by the state, the two programmes have different characteristics and historical-political contexts (Penteado and Fortunato, 2015; World Food Programme, 2025). In 70 years, Brazil has made substantial progress in lifting children out of malnutrition, and national food insecurity rates are now lower than New Zealand’s, as measured by the Food and Agriculture Organisation of the United Nations (FAO, 2025a). PNAE has managed to endure despite major political challenges. Using a health policy analysis framework, this study sought to learn what elements of Brazil’s school meal programme have contributed to its success, and gather insights to support New Zealand’s fledgling programme.

Methods

Study design

This qualitative retrospective study involved a literature review and documentary analysis of the school meal programmes in Brazil and New

Zealand. Official policy documents were analysed, and, based on these, a survey was conducted of articles that could contribute to filling the information gaps identified by the review. Data was collected from June to September 2025. The team conducting the analysis comprised PNAE insiders (nutritionists at a secondary school in São Paulo and a senior official for the programme federally), and public health nutrition experts who have been involved in evaluating Ka Ora, Ka Ako since 2021.

Theoretical framework

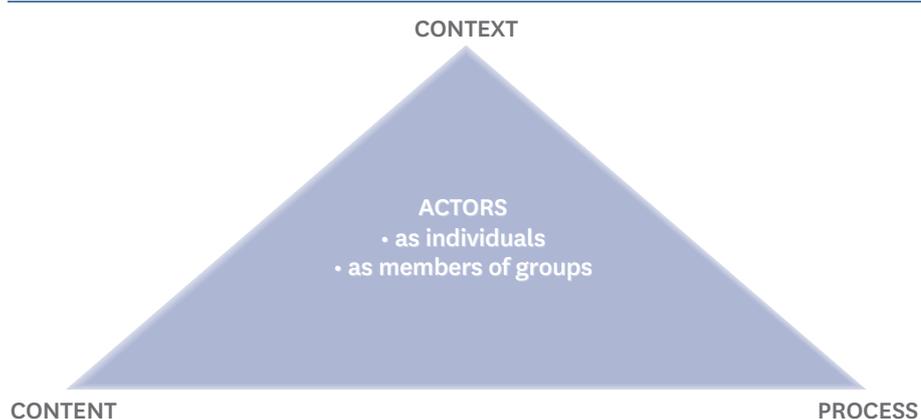
Data analysis was based on Walt and Gilson’s triangle framework for health policy analysis, which takes a multidisciplinary approach to public policy and seeks to explain the interaction between institutions, interests and ideas in the political process. The model facilitates a comprehensive understanding of how policies were formulated, implemented and evaluated, considering political, social, economic and cultural factors, as well as identifying the role of the various actors involved and the changes that occurred in policy implementation through the analysis of four components – content, context, actors and the process – as shown in Figure 1.

For this study, we created sub-components for three of the four elements based on the authors’ knowledge of school food programmes. The sub-components created within ‘content’ were objective, guidelines, nutrient standards and budget. The ‘actors’ component was subdivided into stakeholders, people of interest, executors, providers, beneficiaries and civil society. The ‘process’ component was divided into programme evolution, management, monitoring and evaluation.

Document review and data analysis

A literature review was conducted to gather comprehensive information on both policies. This included a document review of the two policies and the main statements, policies and regulations in force and their amendments. These documents were collected from official government websites. This was complemented by a targeted review of scientific articles sourced from Scielo, Google Scholar and the University of Auckland Library, to fill

Figure 1: Framework model for health policy analysis.



Source: Walt and Gilson, 1994

any gaps in the specified framework. This literature was identified based on the researchers' knowledge and using targeted keyword searches. Table 1 presents all the documents included.

The information was deductively coded according to the framework and sub-components using the Taguette tool for qualitative data analysis, and then organised into Excel tables for better visualisation.

The analysis included 39 documents. Of these, 15 were related to data from Brazil and 24 were from New Zealand. Table 1 lists the analysed documents.

The main findings pertaining to the components of the health policy triangle are presented below, beginning with a brief overview of each policy context. A summary of the programme components is provided in the Appendix.

Results

Context

Brazil

The development of public policies for food and nutritional security in Brazil was driven by an historical context of hunger and malnutrition (Leão and Maluf, 2012). For instance, in 1990 in Brazil, according to the Global Burden of Disease study, 7.78% of the disability-adjusted life years (DALYs) reported were due to child growth failure (which includes the conditions of underweight, wasting and stunting, for children of all ages). In 2021 this figure decreased to 0.33%. However, the percentage of DALYs attributed to overweight individuals, in the overall population, in 1990 was 3.34%, and by 2021 it had risen to 6.04% (Institute for Health Metrics and Evaluation, 2024).

The first policy actions that recognised hunger as a serious public health problem were taken in the 1930s. In 1940, the Social Security Food Service was created, aimed at improving the eating habits of Brazilian workers; this can be considered the country's first public food policy (Peixinho, 2013). In the 1950s a national food and nutrition plan was drawn up, under the title 'Food Situation and the Nutrition Problem in Brazil', and for the first time a school lunch programme was structured at a national level, under government responsibility (FNDE, 2023). Josué de Castro, a federal deputy, professor, member

Table 1: Documents included in the study analysis

Source	Documents
PNAE website and government documents	Brasil, 2009; FNDE, 2020b, 2025c; Brasil, 2025a; PNAE history; PNAE physical and financial data; Brasil, 2025b; Brazilian Federal Constitution, 1988; Brasil, 2019, 2023; IBGE, 2024
Ka Ora, Ka Ako website and government documents	Ministry of Education and Social Development Committee, 2019; Ministry of Education, 2021; Pilot Evaluation: Vermillion et al., 2021; Vermillion et al., 2022; Ka Ora, Ka Ako Nutrition Standards, 2022; Aikman and Yates-Pahulu, 2023; Ministry of Education, 2023, 2024a, 2024b, 2024c; funding agreement; partnership agreement; Ministry of Business, Innovation and Employment, 2025
Academic databases	<i>Brazil: Peixinho, 2013; Vasconcelos, 2005</i> <i>New Zealand: Ministry of Health, 2003; Poata-Smith, 2013; Wynd and O'Brien, 2014; O'Brien, 2014; Brown, 2018; D'Souza, Vandevijvere and Swinburn, 2022; Watts, 2023; Roy, Mackay, 2023; PHAC, 2024</i> <i>Brazil and New Zealand: FAO Hunger Map, 2025; Institute for Health Metrics and Evaluation, 2025</i>

of the FAO and diplomat, had an important role in raising national awareness of the problem of hunger and poverty and promoting projects to fight hunger (Peixinho, 2013).

The next decades were marked by the military dictatorship in Brazil (1964–85), with the suspension of civil and political rights. During this period, the success of public policy actions was heavily compromised, but despite this, PNAE continued to exist (Vasconcelos, 2005).

In 1988 the Federal Constitution was promulgated, with important participation of social movements, at a time of political opening up towards democracy. After this period, social priorities were focused on the country's economic stabilisation. The first attempts to implement neoliberal ideas of state reform occurred, within the discourse of modernisation of the country, which led to a brutal reduction in financial resources and the end of some of the existing food and nutrition programmes. PNAE, however, was not included in these policy cuts (Vasconcelos, 2005; Peixinho, 2013).

Scaled-up efforts to fight hunger in Brazil started from the 2000s within the Lula government. The Zero Hunger strategy was implemented, which recognised that hunger was a social problem. This strategy integrated various programmes and policies related to social assistance, income transfer and structural actions, including job and income generation, agrarian reform and others (Peixinho, 2013).

In 2003 the National Food Security Council (CONSEA) was established, comprised of representatives of the government and civil society, with an advisory role in the implementation of food and nutrition security policies. In 2006 the federal government enacted the Organic Law on Food and Nutritional Security, one of the major legal frameworks for structuring food and nutritional security in the country, with the aim of guaranteeing the human right to adequate food for all Brazilians (ibid.; Vasconcelos, 2005).

The country has progressively accepted the concept of adequate food as a human right, and in 2010 it was included in the Federal Constitution. In 2014, the second edition of the *Guia Alimentar para a População Brasileira* (Food Guide for the Brazilian Population) was published by the Ministry of Health (Brasil, 2014). These guidelines recommend that adequate and healthy diets are based on the consumption of natural or minimally processed foods, with the consumption of processed foods being limited and the consumption of ultra-processed foods being avoided).

In January 2023 the Lula government re-established the CONSEA with significant civil society participation, after it was cut by the 2019–22 Bolsonaro government. Currently, the main Brazilian policy framework for food and nutrition security is the *III Plano Nacional de Segurança Alimentar e Nutricional (2024–2027)* (National Plan for Food and Nutrition Security) (Brasil, 2025b). This is an

intersectoral plan which brings together various sectors of government and civil society and establishes goals and strategies to ensure the human right to adequate food in the country.

Despite the concerted efforts to fight hunger, and notable success, Brazil has not been immune to the shocks and pressures on the global food system and international political economy of recent years, such as the Covid-19 pandemic. According to the FAO Hunger Map, in 2024, 13.5% of the Brazilian population was in a situation of moderate or severe food insecurity (FAO, 2025a).

The prevalence of food insecurity in New Zealand in 2024 was higher than that in Brazil; according to the FAO Hunger Map, 17.3% of the New Zealand population was experiencing moderate or severe food insecurity.

New Zealand

New Zealand is a high-income nation that has enjoyed relatively low levels of acute hunger and malnutrition at the population level, but national statistics mask a legacy of inequities brought about by its colonial past and more recent implementation of neoliberal economic policies (Institute for Health Metrics and Evaluation, 2024; O'Brien, 2014; Poata-Smith, 2013). Despite nutrition problems such as obesity and unhealthy dietary patterns being the biggest contributor to health loss (attributable DALYs), and child food insecurity reaching 27% in 2024, New Zealand lacks a long-term multi-sectoral national food and nutrition strategy that provides guidance for developing policies to improve nutrition and health equity in the country (Ministry of Health, 2003; Roy and Mackay, 2023; Public Health Advisory Committee, 2024).

Hunger and malnutrition are experienced differently in New Zealand than in Brazil. According to the Global Burden of Disease study, in 1990 only 0.15% of DALYs reported for New Zealand

were related to child growth failure, and by 2021 the figure fallen to 0.034%. Conversely, the proportion of overweight individuals in the overall population in 1990 was 5.85%, and this had increased to 7.57% by 2021 (Institute for Health Metrics and Evaluation, 2024).

One of the first people charged with developing and implementing public nutrition policy in the country was Dr Muriel Bell. In 1940 she was appointed the first state nutritionist of the New Zealand Department of Health, a position she held until 1964. At that time, researchers were concerned about the low dietary

consumption of energy, calcium, phosphorus and iron. Bell increased scientific and popular knowledge of nutrition and radically improved the standard of nutrition in New Zealand by promoting programmes such as the distribution of milk in schools, iodisation of table salt, and dissemination of advice on healthy eating (Brown, 2018).

The 1950s was a period of economic prosperity and deregulatory political reforms. In terms of population diet, this period was marked by the dietary excess that replaced diseases of poverty. In the next decade, public health was shifting and the emphasis changed to individual responsibility for one's own health. This period saw the end of the milk in schools programme.

The period from 1984 to 1999 saw a major shift in New Zealand politics, largely due to successive governments implementing a neoliberal political agenda, particularly in social and economic policies (O'Brien, 2014; Poata-Smith, 2013). There were cuts to existing social benefits, which contributed to a rise in social inequality. In

subsequent decades, increasing concerns were raised about food and nutritional security and hunger among the population. One of the visible consequences was the growth of food banks (O'Brien, 2014).

The subsequent decade (1999–2008), with a Labour-led coalition in government, was a period of greater action to reduce social inequalities. One of the initiatives developed was Healthy Eating Healthy Action, which began in 2003 as an integrated and multi-sectoral approach to addressing nutrition, physical activity and obesity. Some of the policies proposed during this period continue today. An example is Fruit in Schools, which began in 2005 to promote healthy eating and combat the increasing rates of preventable health conditions related to poor nutrition and sedentary lifestyles, and a rising obesity epidemic (Ministry of Health, 2003; Watts, 2023).

In 2012, the Children's Commissioner's Expert Advisory Group on Solutions to Child Poverty recommended that the government give immediate attention to designing and implementing 'a collaborative food-in-schools programme, commencing with lower socioeconomic primary and intermediate schools'. The government's response to this recommendation was the allocation of \$9.5 million over five years to support the provision of food in schools by food manufacturing corporations Fonterra and Sanitarium and charity organisation KidsCan (Wynd and O'Brien, 2014).

In 2019, under Jacinda Ardern's Labour government, pursuing a 'wellbeing' agenda and amidst alarming statistics on child poverty, the programme Ka Ora, Ka Ako started as a pilot. The post-Covid-19 economic recovery plan soon provided a political window of opportunity and funding for its expansion. In its first iteration the programme was designed to be more than a solution to food insecurity, also aiming to improve outcomes for education, health and local economies. The budget for the continuation of the Ka Ora, Ka Ako was maintained until 2023. In early 2024, the new National-led coalition government announced a reduction in the amount that would be invested until 2026; this second version of the programme maintained the food security, health and education

objectives, but not that of supporting local economies. A similar scale of school food provision was maintained for approximately one quarter of students, albeit with a significantly reduced budget (referred to in this paper as version 2 of Education and Social Wellbeing Committee, 2019; Ministry of Education, 2021, 2024c, 2025c).

Currently, there are other food programmes operating in schools and kura, but issues have been raised around sustainability, stigma, variability, and measuring effectiveness (Vermillion et al., 2021; D’Souza, Vandevijvere and Swinburn, 2022; Vermillion et al., 2022; Watts, 2023). Many schools receive no government support for food provision and rely heavily on volunteers and donations, limiting scalability and sustainability (Ministry of Education and Social Wellbeing Committee, 2019). The most common food provision programmes are Fonterra’s Milk for Schools, KickStart Breakfast and Fruit in Schools. Of these, only the Fruit in Schools programme is not supported by private organisations (D’Souza, Vandevijvere and Swinburn, 2022; Watts, 2023).

The prevalence of food insecurity in New Zealand in 2024 was higher than that in Brazil; according to the FAO Hunger Map, 17.3% of the New Zealand population was experiencing moderate or severe food insecurity. This is the highest measured value for New Zealand since 2014, when the survey began (FAO, 2025a).

Actors

The Brazilian and New Zealand school meal programmes have distinct constellations of actors involved. PNAE has a wide array of actors engaged in the programme (Figure 2), which allows it to be maintained as a decentralised and integrated system. This includes policy entrepreneurs who contributed to its initial implementation and its maintenance as a right for all students, such as Josué de Castro and Luis Inácio Lula da Silva. Certain organisations are responsible for the programme design, monitoring and evaluation, such as the presidency of the Republic, the Ministry of Education and the National Fund for Education Development (Fundo Nacional de Desenvolvimento da Educação – FNDE). The Collaborating Centers for School Feeding and Nutrition (Centros Colaboradores em Alimentação

Figure 2: Actors involved with the Brazilian school meal programme

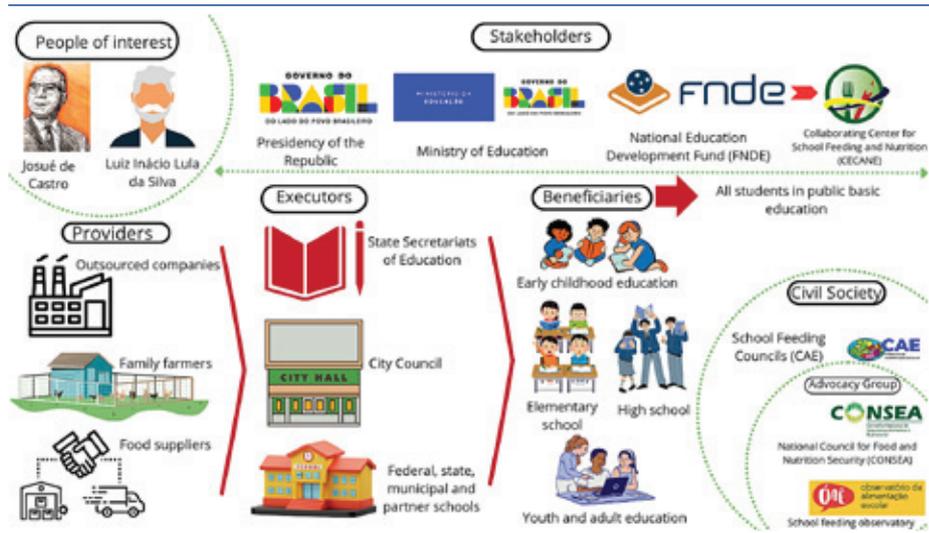
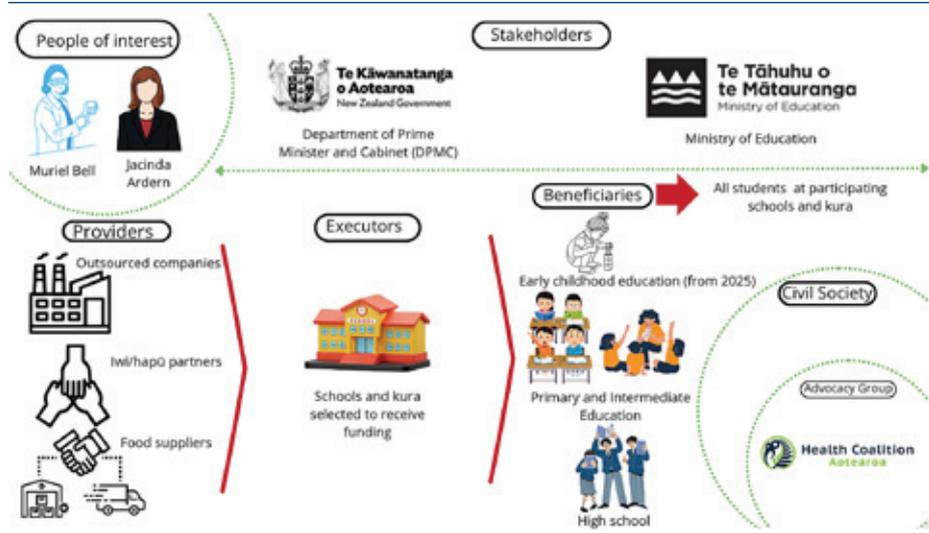


Figure 3: Actors involved with the New Zealand school meal programme



e Nutrição do Escolar – CECANEs) are reference and support units established through a partnership with FNDE and are responsible for offering technical and operational support to PNAE, and contribute to maintaining the decentralisation of the programme.

Besides that, PNAE providers (private outsourced companies, family farmers and private food suppliers) are responsible for guaranteeing the food supply, with family farmers being recognised as fundamental to ensuring the programme’s objectives. The programme is implemented and overseen by different actors from different levels of government, including state and municipal, and federal schools, which are the executing entities responsible for delivering the programme to all students in public schools.

In addition, to guarantee that the programme operates well, PNAE has a

group of civil society actors who voluntarily contribute to its evaluation, advocacy, improvements and maintenance (the School Feeding Council (CAE), CONSEA, the School Feeding Observatory).

In contrast, the Ka Ora, Ka Ako has relatively few organisations, institutions and individuals involved (Figure 3). Ka Ora, Ka Ako is managed by the Ministry of Education with the support of the Department of the Prime Minister and Cabinet. There are some internal school providers; however, under the 2025 version of Ka Ora, Ka Ako, one centralised group of outsourced companies was contracted to supply food for most schools.

Content

Objective

Both programmes aim to address food insecurity and hunger. In the beginning, the goal of Brazil’s programme was to facilitate

access to school meals of higher nutritional value. Later, PNAE expanded the aims to include contributing to the growth and biopsychosocial development, learning, academic performance, and formation of healthy eating habits of students through food and nutritional education and the provision of meals that cover their nutritional needs during the school year. Post-2009, objectives have broadened to create wider ripple effects throughout the food system. Similarly, Ka Ora, Ka Ako version 1 aimed to reduce food insecurity, improve nutrition and health, reduce barriers to education and improve learning outcomes, and stimulate

dietary needs. Both programmes also have similar determinations regarding quality and sanitary hygiene control for the physical structure, production, handling and distribution of food.

Regarding the menus used in the programmes, PNAE requires that they are prepared by dietitians. Every executor has a responsible registered dietitian, with a minimum number of dedicated professionals legally established. The ratio varies depending on the number of schools, students and their location, but in federal schools, for example, one dietitian is required for every 1,000 students. In Ka

Budget

Funding for both programmes must be included in the country's annual budget. However, because PNAE in Brazil is established under federal law, its minimum funding allocation is guaranteed in the annual budget law. To ensure that adequate funds will be available, the federal government uses the resources collected from a corporate tax known as the 'education salary' (salário-educação). Companies pay 2.5% of the total remuneration paid to employees, monthly. This tax is intended to finance public educational initiatives and programmes.

The federal funds received for the PNAE programme are for the purchase of food only, with the state, municipalities and federal schools providing additional funding for implementation.

For Ka Ora, Ka Ako, the funding comes only from the Ministry Education budget and has always been limited to specific periods, with no guarantee of sustained operation. The central government's investment is to cover all the programme-related expenses.

With respect to the amount invested in both programmes per student per day, for PNAE the Brazil federal government pays between R\$0.41 and R\$2.56 (approximately NZ\$0.13 and \$0.83), depending on the length of school day and the type of school. Ka Ora, Ka Ako version 1 paid between \$5.56 and \$8.29 (approximately R\$17.23–R\$25.70), depending on the age of the students and the teaching modality. In Ka Ora, Ka Ako version 2, the amounts were reduced to \$3 (about R\$9.30) for external model schools, with an additional \$0.84 for students aged nine and older, and \$4 (near to R\$12.40) for internal model schools. These figures are, however, not directly comparable as the cost of food and cost of living (relative to income) differ significantly between the two countries.

In terms of the scale of national investment, in 2023 Brazil's GDP was R\$10.9 trillion (Instituto Brasileiro de Geografia e Estatística, 2024), while the decentralised value of federal resources for the PNAE in the same year was R\$5.26 billion, plus what the executing entities could invest (which may be approximately the same amount or more than that invested by the federal government) (FNDE, 2025b; ÓAÊ,

For Ka Ora, Ka Ako, the funding comes only from the Ministry Education budget and has always been limited to specific periods, with no guarantee of sustained operation.

local employment. Since its reduction in investment, Ka Ora Ka Ako (version 2) considerably reduced these aims to reducing food insecurity by providing a daily nutritious lunch to students at schools and kura in need of the greatest support.

Guidelines and nutrient standards

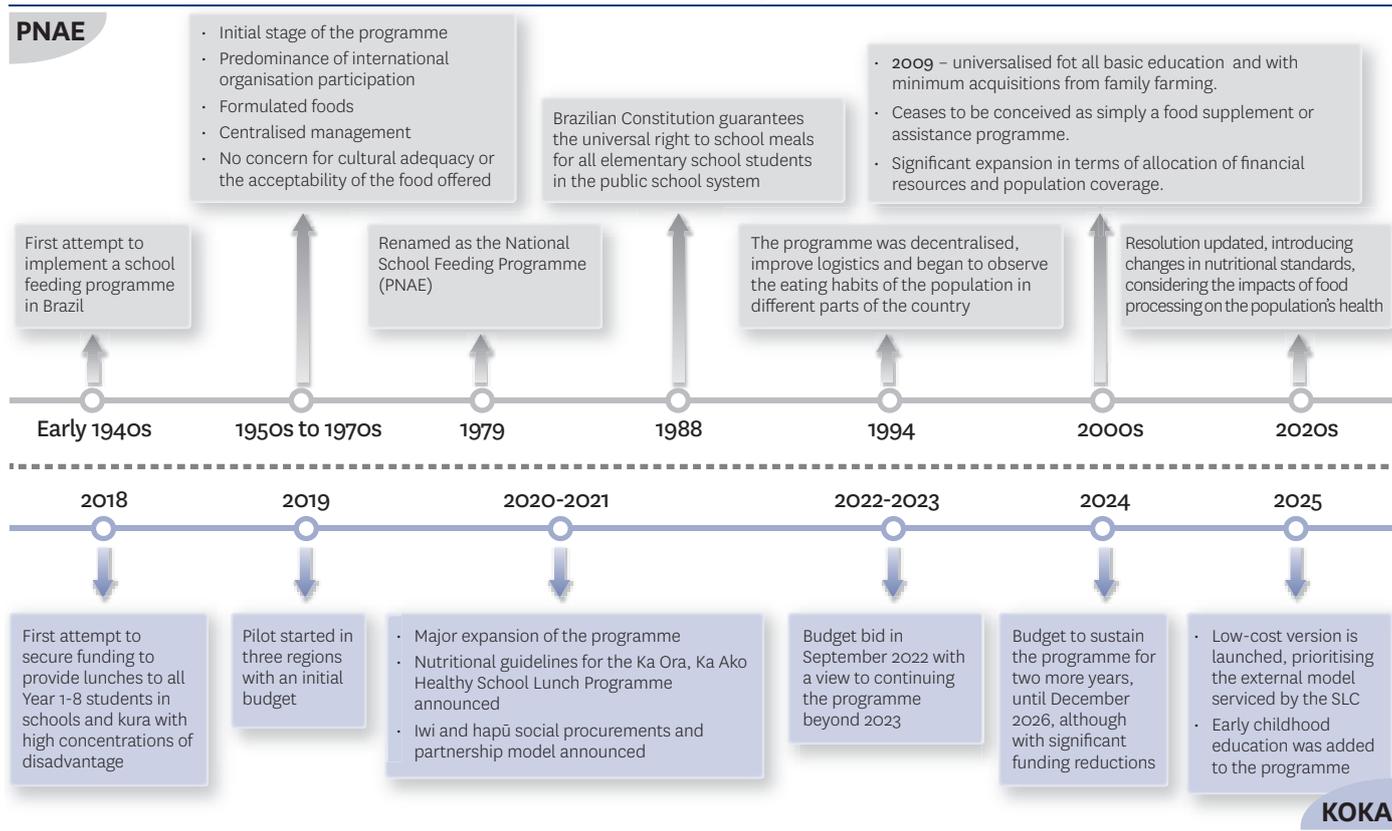
Despite both programmes being labelled as 'universal coverage', there is a key difference in their scope of delivery. In Brazil, all students enrolled in basic public education (from kindergarten and preschool through to high school, including Youth and Adult Education and indigenous and Quilombola schools) have the right to receive school meals. Ka Ora, Ka Ako serves all students in eligible schools according to the school's position in the Ministry of Education's Equity Index. Currently, the lunches reach about 25% of students nationally through this system (Ministry of Education, 2024d).

Both programmes have strong guidelines on food quality, indicating that school meals must consist of safe, nutritious food, respect local culture, traditions and eating habits, and accommodate students with specific

Ora, Ka Ako, under the internal provision model the school is responsible for preparing menus and submitting them for analysis by a small team of nutritionists at the Ministry of Education. In the external provision model, this menu preparation is conducted by an outsourced company, before being checked by the ministry.

Both programmes have structured nutritional standards. However, PNAE requires that the menus meet a certain percentage of the students' daily nutritional needs according to their age (school years) and length of time spent at school, as well as meet specifications regarding the types of foods provided and their level of processing (with limits on the provision of ultra-processed foods). Needs are established according to the average age at each school stage. In New Zealand, meals must meet the criteria for the minimum mandatory items, as well as the weights established per portion for each age group. In addition, there are restrictions on the use of some foods, defined by a traffic light system: the Health Star Rating system is used to set 'green', 'amber' and 'red' criteria for some food categories, based on their nutritional value (Ministry of Education, 2022).

Figure 4: Timelines of the evolution of the Brazilian and New Zealand programmes



FINEDUCA, 2021). Thus, around 0.1% of Brazilian GDP was invested in the programme. In New Zealand in the same year, GDP was \$393.52 billion, while the resource value for Ka Ora, Ka Ako was \$323 million (Ministry of Business, Innovation and Employment, 2025; Ministry of Education, 2024a). Thus, the investment in the first version of Ka Ora, Ka Ako was around 0.08% of New Zealand's GDP.

PNAE establishes criteria for the use of these financial resources. Currently, at least 80% of the total amount must be used for purchasing natural or minimally processed foods, increasing to 85% in 2026; a maximum of 15% is allocated to processed and ultra-processed foods, decreasing to 10% in 2026; and 5% is allocated to culinary ingredients. Another difference is the mandatory purchase of food from local family farms. The minimum amount to be used for purchasing food from family farms in 2025 was 30% of the resources allocated by the government; this will rise to 45% in 2026.

Process

Management

PNAE executors have the autonomy to decide which format to adopt, which can be centralised, decentralised or school-

based management, or semi-decentralised or partially school-based management. In Ka Ora, Ka Ako version 1, schools could choose between external, internal, internal partnership, iwi and hapū, and mixed delivery options. In Ka Ora, Ka Ako version 2, internal models still exist, but the external model with one centralised supplier collective is preferred. In terms of programme management, PNAE has several organisational levels, with the federal government, through FNDE, responsible for regulations, monitoring and evaluation, and the executor entities responsible for the development and guarantee of the policy's execution at the local level. In New Zealand, Ka Ora, Ka Ako is managed solely by the Ministry of Education.

Monitoring and evaluation

The responsibility for PNAE programme monitoring is shared among various stakeholders, such as schools, FNDE, civil society (represented by CAE), and federal government oversight and control entities (the Federal Court of Accounts, comptroller general of the union and Public Prosecutor's Office). Under Ka Ora, Ka Ako, schools are responsible for

submitting implementation information to the Ministry of Education.

As for evaluation, monitoring information for PNAE is compiled by FNDE and made public on the programme's official website, allowing external technical analysis and research to verify whether the programme's objectives are achieved or not, but formal evaluations organised by the government are not carried out. In contrast, in the Ka Ora, Ka Ako programme, the government is responsible for contracting outsourced companies to conduct programme evaluations. Formal evaluations were conducted of the pilot and Ka Ora, Ka Ako 1, but for Ka Ora, Ka Ako 2, a formal monitoring and evaluation plan had not been finalised more than a year after its announcement (Aikman and Yates-Pahulu, 2023; Vermillion et al., 2021; Vermillion et al., 2022).

Programme evolution

Figure 4 shows the historical timelines of the two programmes. The PNAE trajectory began in the 1940s, with the first discussions around the implementation of a school feeding policy in the country. The policy was initiated in 1955, with a centralised programme characterised

by the supply of industrialised (highly processed) products offered through international cooperation.

In 1979 the programme adopted the name it has today, and in 1988, with the promulgation of the Federal Constitution, all elementary school students in public schools in the country gained the right to school meals. In 1994 the programme was decentralised, through agreements with municipalities and state education departments. The number of municipalities which joined the decentralised programme increased to more than 70%; consequently, more students could be served, the distances travelled for food supply were reduced, and there could be better integration of the different food cultures

centralised supply system, which affected the ability to source locally prepared food and engage close-proximity suppliers, menus were standardised of across the entire country, without consideration of local preferences. Ka Ora, Ka Ako version 2 received funding in the 2024 budget to operate until the end of 2026. The future of Ka Ora, Ka Ako from 2027 will be considered by Cabinet (Ministry of Education, 2025c).

Discussion

School meal programmes are recognised globally for their multiple benefits for students, families, schools, society and the environment (Bandoni et al., 2024; Garton et al., 2023; World Food Programme, 2025).

argued, has resulted in increased food insecurity and obesity (Brown, 2018; O'Brien, 2014). Currently, the prevalence of childhood (2–14 years) obesity in New Zealand is 12.5%, and 27% of children live in households with moderate to severe food insecurity (Ministry of Health, 2003; UNICEF, 2025). Historically, the country has relied upon charities and private companies to try to fill the gap of food insecurity (D'Souza, Vandevijvere and Swinburn, 2022; Ministry of Education and Social Wellbeing Committee, 2019; O'Brien, 2014; Wynd and O'Brien, 2014), and there is no single, central food strategy (Roy and Mackay, 2023).

The distinct social, health and political contexts led to different programme evolution trajectories. PNAE in Brazil from a centralised federal government programme primarily offering ready-to-eat foods, to a decentralised one with shared management among various actors and the acquisition of food from local family farmers, consequently ensuring local development, fresher food and support for the local food culture strategy. Conversely, in New Zealand, owing to reduced financial resources and a prioritisation of the centralised system, most of the programme's resources remain with just one collective of supplier companies. Although this second version of Ka Ora, Ka Ako has not been evaluated, media reports and public appeals from school principals suggest that this change has led to a decrease in the quality of food offered, and logistical issues have also resulted in difficulties in supplying fresh, safe food (Health Coalition Aotearoa, 2025; Harris, 2025).

In 70 years, Brazil has seen massive success in lifting children out of malnutrition, and food insecurity rates are now lower than New Zealand's. This shift was supported through a decentralised school food programme, with strong civil society engagement, funding shared between federal and local governments, and concerted effort to achieve wider system-level benefits.

The authors posit that these different contexts may bring different levels of urgency and values ascribed to the programmes. It may be that the public emotional response to images of thin,

It may be that the public emotional response to images of thin, starving children is stronger and more urgent than statistics of high food insecurity linked with childhood obesity, which is often perceived as an individual failing, not a failure of society or politics ...

existing in the country (FNDE, 2023).

The 2000s were an important period of strengthening and expansion of the programme, with the universalisation of food for all students in Brazilian public schools and the inclusion of the mandatory purchase of food from family farming, as well as the recognition of the policy as a guarantee of the constitutional Human Right to Adequate Food. In the 2020s, there was an expansion of the amount invested in family farming and stricter rules for the purchase of ultra-processed products.

Ka Ora, Ka Ako began in 2019 as a pilot project, and in 2020 and 2021 underwent a period of expansion and structuring. It was operational until the end of 2024, when a significant budget reduction led to the launch of a new version of the programme. In addition to prioritising a

The two national programmes analysed in this study have distinct trajectories in terms of their history and public policy context. The Brazilian programme started in the context of substantial hunger and undernutrition, and it survived a prolonged period of military dictatorship. However, with the increasing participation of civil society, government policies supporting local farming, and a collective of participating institutions such as CONSEA and CAE, the programme is now strongly institutionalised, making it resilient against future political and commercial threats (Leão and Maluf, 2012; World Food Programme, 2019).

New Zealand's public policy paradigm in recent decades has been marked by a strong neoliberal focus and a personal responsibility narrative which, it has been

starving children is stronger and more urgent than statistics of high food insecurity linked with childhood obesity, which is often perceived as an individual failing, not a failure of society or politics (Jiménez, 2019). Furthermore, the history of neoliberal policies and an individual choice narrative of individualism means that in New Zealand many people perceive school meals as a responsibility of parents rather than the state (Brown, 2018; O'Brien 2014; RNZ, 2025). In addition, because it has few actors involved, the Ka Ora, Ka Ako programme may become vulnerable to political power shifts and compromises the degree of engagement from society and potentially, societal acceptance.

Additionally, the fact that PNAE serves all students, thus making it more visible and well-known, may lead to greater public encouragement and better acceptance of school food as a social investment. Moreover in New Zealand, the targeting of school meals to schools with the greatest number of students 'in need' risks stigmatisation of recipients and a perception of the programme as welfare assistance. The current delivery of Ka Ora, Ka Ako to only 25% of schools has also resulted in a significant number of food-insecure children attending schools not receiving the programme (Gerritsen et al., 2023).

PNAE has been around long enough to have become normalised, and values of supporting children, families and smallholder farmers have become embedded. This mostly occurred after the redemocratisation of the country, and especially during the Lula government's first term and the Zero Hunger initiative. The participation of multiple actors from civil society and government, with institutionalised interconnections, allows the programme to achieve broader societal impacts. However, we note that there has been a lack of formal outcome evaluation, the benefits of the investment being largely implicit.

In contrast, Ka Ora, Ka Ako is a new programme, which found its political window of expansion during the Covid-19 pandemic, but then suffered a drastic contraction under a new government. Ka Ora, Ka Ako is administered solely by the Ministry of Education, without civil society

participation and with minimal input from other ministries, and primarily through centralised distribution. These factors affect the sense of belonging to the programme and undermine its acceptance, as well compromising the ability to attain other systemic benefits, such as increased local employment and strengthening local food systems, with consequent environmental implications (World Food Programme, 2025). Moreover, its values are still highly politically contestable (Ministry of Education, 2019, 2024a, 2024d).

The political right which came to power in New Zealand in 2023 places a high value on low taxes and considers food insecurity and obesity to be the responsibility of

2019 the states and municipalities invested more than twice the value invested federally from FNDE (ÓAÊ, FINEDUCA, 2021). In Ka Ora, Ka Ako version 2, the initial reduced payment per meal was too low and it has since been topped up using various mechanisms, but all from the Ministry of Education (for example, adding to School Lunch Collective budget or extra budget allocated to schools for the implementation, allowing schools to use some of their education funding for the meals) to make the programme viable (Ministry of Education, 2025c).

International studies have shown that school meal programmes provide a strong return across a range of multi-sectoral

The lessons that [Programa Nacional de Alimentação Escolar] can provide are the universality for all students in all public schools achieved at scale with an investment of about 0.1% of GDP; and the integration of communities and civil society being vital for programme resilience.

individuals and families (Ministry of Education, 2024a). This makes the New Zealand programme very fragile. Ka Ora, Ka Ako version 1 was heavily monitored and evaluated to ensure accountability to taxpayers, which has the potential to facilitate continuous improvement towards achieving desired outcomes. However, the lack of permanent funding and political contestability compromises the programme's transformative potential (FAO, 2025b; Vermillion et al., 2021; Vermillion et al., 2022).

Budget allocation is a critical variable in creating viable and sustainable public policies (FAO, 2025b; World Food Programme, 2025). In this regard, the two programmes are located in different economic models and have distinct forms of financing. For PNAE, the executing entities have to provide money to complement the federal budget, and in

outcomes (World Food Programme, 2025). For every dollar spent on school meals, there is an approximate \$9 return across education, health, nutrition and social protection, while up to \$30 per \$1 returns can be unlocked in wider social and economic benefits, with these values being widely variable depending on context (Global Child Nutrition Foundation, 2025; World Food Programme, 2025). In Brazil, for example, for every R\$1.00 invested in purchasing food from family farming through PNAE, the national GDP grows by R\$1.52 in family farming and R\$1.66 in family livestock farming (ÓAÊ, 2025). It was also found that, in addition to improvements in GDP, the programme benefits employability and promotes more equitable economic development (Oliveira et al., 2025).

Normative and legal frameworks serve to guarantee stability for programmes

beyond the decisions of a specific government, making them into state policies (UNICEF, 2025; World Food Programme, 2019). In the PNAE case, the programme evolved progressively until it reached the current conception of law, with a robust legal framework and the participation of civil society. Ka Ora, Ka Ako is still relatively young, in the midst of determining what policy settings will optimise success, but it would be strategic to look to other programmes internationally with recognised success to ensure that changes in the political context do not interfere with the programme's smooth progress.

The lessons that PNAE can provide are the universality for all students in all public schools achieved at scale with an investment of about 0.1% of GDP; and the integration of communities and civil society being vital for programme resilience. This is possible because it is a long-term, decentralised,

democratic programme with social participation to guarantee the human right to adequate food. Ka Ora, Ka Ako version 1 showed that formal evaluations of the initiative could contribute to better policy guidance. Furthermore, this study shows how comparative policy analysis can contribute deeper understanding of programmes and, ultimately, better targeting of actions.

This study has the limitation of the results not being widely generalisable, as other programmes will have their own distinct contexts and challenges. However, its strengths are the depth of the study team's expertise, represented by public health nutritionists, social scientists and education specialists with deep knowledge of both programmes.

Conclusion

This study compared Brazil's National School Feeding Programme (Programa

Nacional de Alimentação Escolar) and Ka Ora, Ka Ako, two programmes at different ends of the spectrum in terms of timelines (an older and more deeply rooted PNAE and the newer Ka Ora, Ka Ako); distinct triggering problems (hunger and undernutrition versus food insecurity and obesity); different levels of social embeddedness (strongly embedded versus contested values); and institutionalisation (a multi-agency and democratised programme versus single-agency management). The authors conclude that, despite these differences, both programmes provide lessons that could support future school meal improvement, in New Zealand, Brazil and internationally.

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Appendix: Summary table of the programme components

	Context	Actors	Content	Process
Brazil (PNAE)	Brazil has a historical context of hunger and malnutrition. The first actions on these issues started in the 1930s; national policies began to be developed in the following decade, and in the 1950s a school lunch programme was established. Following two decades of military dictatorship, in the 2000s the Lula government scaled up efforts to fight hunger in Brazil. The country has progressively accepted the idea of adequate food as a human right, with policies, laws and civil society participation.	<p>People of interest: Josué de Castro, Luiz Inácio Lula da Silva</p> <p>Stakeholders: Presidency of the Republic, Ministry of Education and National Education Development Fund (FNDE), with Collaborating Centers for School Feeding and Nutrition</p> <p>Executors: State secretariats of education, city halls and federal, state, municipal and partner schools</p> <p>Providers: Outsourced companies, family farmers and food suppliers</p> <p>Beneficiaries: All students in public basic education (early childhood education, elementary education, high school, youth and adult education)</p> <p>Civil society: School Feeding Councils, National Council for Food and Nutrition Security and School Feeding Observatory</p>	<p>Objective: Aims to contribute to the growth and biopsychosocial development, learning, academic performance and the formation of healthy eating habits of students, through food and nutritional education and the provision of meals that cover their nutritional needs during the school year.</p> <p>Guidelines and nutrient standards: Menus are prepared by responsible dietitians; menus must meet a certain percentage of the students' daily nutritional needs, as well as meet specifications regarding the types of foods to be provided and their level of processing.</p> <p>Budget: PNAE pays between R\$0.41 and R\$2.56, depending on the length of the school day and the type of school.</p>	<p>Management: Autonomy to decide which format to adopt – centralised, decentralised or school-based management, or semi-decentralised or partially school-based management.</p> <p>Monitoring and evaluation: Monitoring responsibility is shared among various stakeholders, such as schools, the FNDE, civil society represented by the CAE, and federal government oversight and control entities. For evaluation, the monitoring information is compiled by FNDE and made public, allowing external technical analysis and research to verify whether the programme's objectives are achieved or not, but formal evaluations organised by the government are not carried out.</p> <p>Programme evolution: PNAE started in 1955, with a centralised programme characterised by the supply of industrialised products; it evolved into a decentralised (1994), universal programme, with food purchased from local family farmers (2009) and restrictions on the use of ultra-processed foods (2020 and 2025).</p>
New Zealand (Ka Ora, Ka Ako)	There are high rates of childhood obesity and unhealthy dietary patterns. Principles of private enterprise and the free market predominate, with emphasis on individual responsibility for one's own health. However, in recent decades there has been action to reduce social inequalities and develop a wellbeing agenda. Under Jacinda Ardern's government the pilot of the Ka Ora, Ka Ako programme was launched in 2019.	<p>People of interest: Muriel Bell, Jacinda Ardern</p> <p>Stakeholders: Department of the Prime Minister and Cabinet and Ministry of Education</p> <p>Executors: Schools and kura selected to receive funding</p> <p>Providers: Outsourced companies, iwi/hapū partners and food suppliers</p> <p>Beneficiaries: All students at participating schools and kura (eligible schools according to their position in the Ministry of Education's Equity Index)</p> <p>Civil society: Health Coalition Aotearoa act as voluntary external advocates for programme improvement</p>	<p>Objective: In its first iteration, Ka Ora, Ka Ako aimed to reduce food insecurity, improve nutrition and health, reduce barriers to education and improve learning outcomes, and stimulate local employment. Ka Ora, Ka Ako 2 aims to reduce food insecurity by providing a daily nutritious lunch to students at schools and kura in need of the greatest support.</p> <p>Guidelines and nutrient standards: Schools or outsourced companies are responsible for preparing menus and submitting them for analysis by a small team of nutritionists at the Ministry of Education; meals must meet the criteria for the minimum mandatory items, as well as the weights established per portion for each age group. There are restrictions on the use of some foods, with the use of a traffic light system.</p> <p>Budget: Ka Ora, Ka Ako 1 paid between NZ\$5.56 and \$8.29. Ka Ora, Ka Ako 2 pays NZ\$3 for external model schools, with an additional \$0.84 for students aged 9 and older and \$4 for internal model schools.</p>	<p>Management: Initially Ka Ora, Ka Ako schools could choose between external, internal, internal partnership, iwi and hapū, and mixed delivery options. Under Ka Ora, Ka Ako 2, internal models still exist, but the external model serviced by one centralised supplier collective is preferred.</p> <p>Monitoring and evaluation: Schools are responsible for submitting implementation information to the Ministry of Education. The government is responsible for contracting outsourced companies to conduct programme evaluations.</p> <p>Programme evolution: Ka Ora, Ka Ako began in 2019 as a pilot project and was expanded in 2020 and 2021, with diverse objectives and providers. At the end of 2024 there was a significant budget reduction. Ka Ora, Ka Ako 2 received funding in the 2024 Budget to operate until the end of 2026; Cabinet needs to consider the continuity of the programme.</p>

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Whānau Ora 2.0

the real problem isn't the who, it's the what

Abstract

The evolution of Whānau Ora is often seen as a contest between providers, but the deeper issue is the erosion of its original institutional logic. This shift weakens the policy's transformative potential and risks diminishing Indigenous-led approaches to entrenched social issues. As social investment becomes more influential, understanding and intentionally applying models of impact creation is vital. Whānau Ora's foundation in self-determination and relational practice offers valuable lessons that could significantly enhance contemporary investment strategies, but only if its core logic is preserved and applied with fidelity.

Keywords Whānau Ora, self-determination, mana motuhake, social investment, social impact, commissioning models

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Whānau Ora has long stood apart in the landscape of public policy in Aotearoa, not as a programme or service, but as a bold expression of belief in the transformative potential of whānau. Conceived as a model grounded in self-determination, relational practice and whānau-led aspiration, it offered a rare alternative to transactional approaches in the social sector. Today, that vision stands at a crossroads.

This article is written for policymakers, public servants and community leaders grappling with the future of Whānau Ora. It argues that the current reforms risk hollowing out its original intent, not through overt rejection, but through deliberate shifts in funding logic, relational practice and trust. What is at stake is not simply the design of a commissioning model, but the integrity of a policy that has demonstrated a unique capacity to restore mana motuhake and foster intergenerational wellbeing. In what follows, we revisit the founding design of Whānau Ora, examine how it has been realised through Te Pūtahitanga o Te Waipounamu, and assess

the implications of recent policy changes that threaten to erode the foundations of this transformative approach.

The original vision of Whānau Ora

Whānau Ora was born from an uncompromising belief in the transformative capacity of whānau. Its introduction, evolution and expansion since it first emerged in the health sector with the symbolic blueprint of He Korowai Oranga in 2002 has been arguably one of the most distinctive developments in approaches to lifting wellbeing and social impact creation more generally over the last two decades (see Smith et al., 2019 for a compelling and comprehensive overview of the evolution of Whānau Ora).

Spearheaded by Tariana Turia and guided by the intellectual leadership of Mason Durie, the policy emerged from a deep conviction: that whānau, when properly supported, have the ability to alter their own life trajectories. Whānau Ora as originally conceived was a policy expression of self-determination, not in the overtly political sense of sovereignty or constitutional recognition, but in the subtler, often overlooked domain of community habit and mindset. In many ways, it sought to restore the soft infrastructure of mana motuhake: the inner architecture of aspiration, relational strength and collective efficacy that enables whānau to act as self-determining units.

As Turia put it, 'Whānau Ora is not about health, education, or welfare – it is about the people. It is about restoring to our whānau the belief that they have the solutions to their own problems and the power to create their own futures' (Turia, 2010). This was never intended to be a service delivery mechanism. It was a deliberate intervention to disrupt dependency thinking and enable whānau to move from surviving to thriving, on their own terms.

In so doing, it resonates with earlier Māori leadership, such as the philosophies espoused by Tā Apirana Ngata, or the waiata of composers such as Henare Waitoa and Tuini Ngawai. The latter claimed that the end result of income support would be the destruction of the people; it would attack the memories, it would erode the essence of their souls. 'Patu tangata, patu mahara, patu mauri.'

The original Whānau Ora commissioning model ... often overlooked, logic that whānau defining their own goals was the means to, rather than product of, positive trajectory shifts.

Durie similarly articulated Whānau Ora not as a narrow intervention but as a holistic repositioning of state–community relations: 'The goal of Whānau Ora is whānau wellbeing – to empower whānau as a whole, not just individuals, to take control of their futures. It requires us to trust whānau, not just to support them' (Durie, 2011, p.3). This emphasis on trust, holistic wellbeing and collective capacity underpinned the distinctive nature of Whānau Ora. It was not about delivering to whānau, but investing in their potential; not about building programmes to 'fix' narrowly defined 'problems', but restoring rangatiratanga at the flax roots.

This conceptualisation of self-determination diverges from dominant academic and policy narratives, which typically understand self-determination in political or institutional terms. One prominent perspective is grounded in constitutional claims, such as those advanced by Te Aho (2011), which assert the need for autonomy from the Crown and the restoration of Māori political authority. Another, seen in the tribal governance literature (Cornell and Kalt, 2000), focuses on developing effective Indigenous institutions capable of delivering outcomes through self-governance. Both have made critical contributions to our understanding of Māori development.

Yet these frameworks tend to assume a foundational capacity for self-determination; that the psychological, relational and cultural infrastructure necessary for collective autonomy is already in place. In reality, colonisation has disrupted not only political structures but also the internalised sense of agency that underpins them. The ability to think beyond constraint, to believe in one's own capacity and to act in unison has been profoundly undermined by generations of deficit positioning and external control. The original vision of Whānau Ora understood this implicitly. It sought to address not the structures of governance, but the fabric of whānau life: to reawaken a sense of possibility and renew the relational practices that sustain mana motuhake.

This is what makes Whānau Ora unique among public policies in Aotearoa: its original design aimed to move beyond prescribed interventions to catalyse, restore and amplify collective imagination to be futures building. While this may seem ethereal for a policy architecture, there is an important premise that achieving wellbeing relies on whānau rewriting the stories they hold about themselves and the life trajectories they believe themselves capable of realising. In doing so, it provides the conditions for deeper, more enduring change. As McMeeking and Savage (2020) argue in the context of Covid-19 responses, kaupapa Māori approaches to development do not just seek equitable access to services, but aim to re-establish the capacity for whānau to act with agency, resilience and vision. These characteristics are often seen as the desirable outcomes of social interventions. Whānau Ora, as originally conceived, inverts this positioning so that the reclamation of agency is the causal pathway by which social 'goods' are achieved.

The original Whānau Ora commissioning model was premised on this important, but often overlooked, logic that whānau defining their own goals was the means to, rather than product of, positive trajectory shifts. To enable whānau to be self-determining in this way was given effect to through two key commissioning approaches: Whānau Ora navigation and direct commissioning. Whānau Ora 'navigators', rather than acting as case managers or brokers of services, were

Figure 1



catalysts of possibility – working alongside whānau to surface dreams, stitch together relational support, and map out pathways to a better future. This aspirational mode of practice was a deliberate rejection of the transactional mindset that characterises much of the social sector (Savage et al., 2017). Direct commissioning practices varied across the three initial agencies (Pacific Futures, Pou Matakana (later the Whānau Ora Commissioning Agency) and Te Pūtahitanga o Te Waipounamu). However, commonalities included centring whānau-defined goals to direct what was commissioned and placing high relational trust in community-embedded entities to realise whānau aspirations. Across both aspects of commissioning, the approach challenged the Crown by resting on the premise that solutions reside not in state bureaucracies but in communities. The investment logic cohered on the principles that investing in the capacity of whānau to define a vision for themselves, to act on their own priorities, and to hold their own definitions of success leads to snowballing gains across multiple social outcome areas.

In this way, Whānau Ora represented a practical expression of what might be called ‘everyday self-determination’ – a set of relational practices, norms and investments that support whānau to act with confidence, connection and control. It took the radical position that self-determination is not only an outcome of political reform, but a necessary condition for it, for without the ability to collectively dream, organise and act, the legal recognition of tino rangatiratanga remains hollow.

Te Pūtahitanga o Te Waipounamu approach

Te Pūtahitanga o Te Waipounamu stood as a powerful exemplar of how the original Whānau Ora vision has been realised in practice. Established as the Whānau Ora

commissioning agency for the South Island, Te Pūtahitanga consistently grounded its approach in a belief that whānau are not passive recipients of support, but active agents of transformation. Its model was built on the principle that investing directly in whānau leadership – through flexible, strengths-based commissioning – can unlock latent potential and catalyse long-term, intergenerational wellbeing (Smith et al., 2019).

While there is demonstrable value in the investment Te Pūtahitanga directed to Whānau Ora navigators, we believe the critical exemplar for this article are the direct commissioning activities. The direct commissioning model enabled whānau to determine their own aspirations, design bespoke responses, and draw on cultural strengths and whakapapa to guide their decision making. Rather than seeing whānau as units of service need, Te Pūtahitanga commissioned to invest in capability – resourcing whānau to act, not just cope. In practical terms, what Te Pūtahitanga directly commissioned ranged from intergenerational maara kai (community gardens), whānau social enterprises and community gyms to cultural reconnection initiatives and beyond. The diversity of ‘what’ was invested can obscure the shared fundamentals: whānau identified an ambitious undertaking that they believed would shift trajectories and produce ripple gains across multiple social outcomes. The act of commissioning was not merely the transfer of enabling funds, but an affirmation of belief in the people behind, and purpose of, the initiative (McMeeking, Leahy and Savage, 2020).

This type of commissioning can, to cynical eyes, look as though ‘nice to have’ soft outcomes are being prioritised over squarely addressing gritty social issues. Such a view fails, however, to comprehend the originating investment logic: investing in

aspiration and human potential is the causal mechanism by which people solve the ‘gritty issues’ they may experience now or in the future through self-defined trajectory change. In effect, the soft infrastructure of mana motuhake – the norms, habits and relationships that underpin self-determination in everyday life (McMeeking, 2018) – are the conduit through which multiple social gains are catalysed and sustained. Fundamentally, Te Pūtahitanga understood that long-term sustainable change will only occur when agency, authority and accountability rests with those who are the focus of the intervention (i.e., whānau), rather than those external to their unique circumstances. The way the commissioning was delivered also aligned with the position that self-determination must be grounded in relational strength and collective confidence, not just formal autonomy (McMeeking and Savage, 2020). In this way, Te Pūtahitanga preserved and amplified the purpose of Whānau Ora, maintaining fidelity to its original intent even as institutional pressures have shifted around it.

The effectiveness of this approach was borne out by the evaluations of successive investment waves, conducted by Ihi Research. Across these evaluations, a range of ‘social goods’ were consistently empirically validated across multiple domains of quality of life, including subjective sense of life satisfaction, whānau cohesion, financial stability and beyond (Leonard et al., 2025). Perhaps the most important insight across the corpus is that investing in intangible change catalysts such as belief, purpose and aspiration has eminently tangible outcomes, albeit through an attenuated causal pathway. In broad terms, the impact pathway was as shown in Figure 1.

One evaluation used a social return on investment methodology to estimate that every dollar invested by Te Pūtahitanga

generated a return of \$2.40, derived from the combination of avoided costs and positive gains. Avoided costs captured the savings generated by preventing downstream demand for expensive government services: for instance, by reducing youth justice involvement, averting mental health crises, or lessening reliance on emergency housing. Positive gains were the tangible social and economic benefits created through enhanced employment and educational outcomes, strengthened whānau capability, and improved long-term wellbeing (Leonard et al., 2023). These economic metrics are compelling and closely aligned with governmental priorities for increased employment, lower benefit payments and reductions within the criminal justice system. What seems difficult to translate is that these gains come not from narrowly intervening in the site of the ‘problem’, but rather from investing purposively in human potential to overcome multiple ‘problems’ through the cumulative gains arising from self-determined trajectory shift. In our view, these findings affirm that investing in whānau agency yields not only better outcomes, but also deeper impact by building the very foundation from which structural self-determination can be enacted.

The relational quality of Te Pūtahitanga’s approach was also central to its success. Rather than adopting a transactional model of grant-making, the commissioning process was relational, iterative and grounded in trust. As we have argued elsewhere, kaupapa Māori responses to social need are often characterised by their focus on reweaving the relational fabric of community life – reconnecting people to each other, to their purpose, and to a sense of collective capacity (McMeeking, Leahy and Savage, 2020). This is not an ancillary benefit of Te Pūtahitanga’s work; it was a critical mechanism of change that we have argued elsewhere gained a multiplied impact through a network effect (ibid.). Through sustained investment in relational practice and whānau aspiration, Te Pūtahitanga helped rebuild the soft but essential infrastructure that enables whānau to imagine and pursue lives of their own choosing.

While navigators have long been recognised as a valuable part of the Whānau Ora approach, serving as trusted connectors who walk alongside whānau, this increased emphasis signals a narrowing of focus.

That is why the recent shift in policy settings is so concerning. What is at stake is not simply a set of contracts or the outcome of a procurement process, but the character and vision of Whānau Ora itself. If Whānau Ora is reduced to a delivery mechanism – assessed on narrow outputs, disconnected from whānau aspiration, and detached from its relational foundations – we risk eroding one of the few spaces in the state sector where mana motuhake is actively nurtured.

The original vision of Whānau Ora still matters. It matters because it was never just a policy; it was a proposition about what whānau are capable of which anchored an institutional and investment logic that now has a robust body of empirical evidence behind it. The visibility and intentionality of investment logics, in our view, matters now more than ever as we face deepening inequities and growing demands for systems transformation.

The shift in Whānau Ora’s institutional logic

The recent reconfiguration of Whānau Ora commissioning arrangements has sparked considerable debate, much of

it centred on the identities of the new contract holders. While the selection of new commissioning agencies is significant, this focus risks overshadowing a more profound transformation: a shift in the underlying philosophy and operational logic of Whānau Ora itself.

At the heart of this transformation was the 2025 request for proposals issued by Te Puni Kōkiri, which outlined a restructured funding model. Under the new arrangements, commissioning agencies are required to allocate a minimum of \$125,000 out of every \$150,000 (excluding GST) payment specifically for navigator salaries and associated service provider overheads (Te Puni Kōkiri, 2025b). The significance of this prescription is that it fundamentally rebalances the allocation between navigation and direct commissioning. Whereas under the original commissioning models, the bulk of Whānau Ora funds were available for direct commissioning, navigation now commands over 80%, with only the slender residue available for innovation or direct commissioning. Under this model, the wide array of whānau-led initiatives that Te Pūtahitanga invested in to fuel whānau potential will have limited opportunities within a contested and far more competitive environment.

While navigators have long been recognised as a valuable part of the Whānau Ora approach, serving as trusted connectors who walk alongside whānau, this increased emphasis signals a narrowing of focus. The original purpose of Whānau Ora was expansive and aspirational. It aimed to empower whānau to identify and pursue their own goals, and to reweave the relational and cultural fibres of collective wellbeing. By prioritising navigator roles within a tightly prescribed funding envelope, the new model risks reducing Whānau Ora to a delivery mechanism – one focused more on brokering static services to individuals than on enabling transformation within whānau.

The request for proposals further reinforced this shift by placing greater emphasis on reporting requirements, the use of data to identify risk, and demonstrable improvements in ‘individual and whānau wellbeing’ (ibid., 2025b). While outcomes-based accountability is an

important feature of effective policy, there is a risk that this model overcorrects, pulling Whānau Ora into the logic of upstream triage and performance measurement. In doing so, it may lose sight of its original character: to provide whānau with the space, support and trust to imagine and act on their own aspirations.

Equally significant is the replacement of the original three commissioning agencies – Te Pūtahitanga o Te Waipounamu, the Whānau Ora Commissioning Agency and Pasifika Futures – with new entities. While framed as a refresh, this restructuring severs long-standing relationships with the community change agents each have commissioned over a decade of practice, including both whānau and established social-good organisations. As Merepeka Raukawa-Tait, chair of the Whānau Ora Commissioning Agency, warned, the change ‘puts a decade of relationship building at risk’ (Natanahira, 2025). This rupture has implications not just for service continuity, but for the deeper relational fabric that Whānau Ora was designed to nurture.

The revised model also suggests a shift in orientation, from collective to individualistic approaches. With its increased emphasis on navigator-led support and case-based interventions, the system may inadvertently prioritise individual outcomes over the broader, relational development of whānau as cohesive units. This is not a minor technical adjustment; it represents a conceptual retreat from the founding assumption of Whānau Ora: that it is the whānau as a whole, not the individual, that is the primary site of wellbeing.

Perhaps most concerning is the implicit reduction in trust. The original Whānau Ora model entrusted commissioning agencies and whānau with flexibility and discretion, enabling them to respond creatively to whānau-identified goals. The new framework, with its more prescriptive funding allocations and heightened compliance demands, signals a move away from this relational trust model and towards a centrally governed, standardised framework that prioritises data collection over impact. The new contracts have mandatory data sharing with government agencies, which will cascade to all

Over the past decade, Te Pūtahitanga o Te Waipounamu has cultivated not only a network of funded initiatives, but an ecosystem designed to regenerate the soft infrastructure of mana motuhake – restoring confidence, capability and connection within and between whānau.

organisations delivering navigation services as well as the few entities that are directly commissioned for wider Whānau Ora initiatives. While this may look like a sound, efficient way of ensuring service quality, it both connotes low trust from government and may well impair engaging with the so-called ‘hard to reach’ segments for whom mandatory data collection may induce trust barriers with providers.

In composite, these changes reflect a fundamental shift in the institutional logic of Whānau Ora. What was once a bold and relational approach to transformation is at risk of becoming a narrow service infrastructure. While the changes have been presented as administrative updates, they entail a deeper repositioning – one which replaces trust with control, aspiration with measurement, and collective empowerment with individual triage. If this trajectory continues, we may look back on this moment not as a debate over

contracts, but as a turning point in the character of Whānau Ora itself.

What is at risk

The promise of Whānau Ora has always been more than programme efficacy; it is about transforming the underlying conditions that produce intergenerational inequity. At its heart, Whānau Ora is a policy expression of self-determination, one that recognises the enduring power of whānau to heal, organise, and flourish on their own terms. This approach is not only morally compelling, but demonstrably effective, as described above. As we also wrote in the early stages of the Covid-19 pandemic, kaupapa Māori approaches grounded in self-determination are not merely responsive; they are preventative, generative and system-changing. Self-determination, we argued then, is a net gain to the nation, and remains the only approach in contemporary Aotearoa that has reversed entrenched disadvantage at scale (McMeeking and Savage, 2020, p.38).

That observation was borne out during the pandemic, when Māori-led initiatives were able to respond with agility, care and cultural resonance – saving lives, protecting communities and delivering higher-trust outcomes than government-led mechanisms. The capacity for these responses did not emerge overnight; it was built through years of investment in kaupapa Māori infrastructure like Whānau Ora. These investments nourished the relational ecosystems, leadership capability and cultural authority needed to act decisively under pressure. To dismantle that infrastructure now, or to reconfigure it into something narrower and more transactional through the prescribed and compliance-driven contracting, is to squander that capacity and the hard-won lessons it represents.

Nowhere are the risks of the new commissioning model more acute than in Te Waipounamu. Over the past decade, Te Pūtahitanga o Te Waipounamu has cultivated not only a network of funded initiatives, but an ecosystem designed to regenerate the soft infrastructure of mana motuhake – restoring confidence, capability and connection within and between whānau. This has not been a passive process. It has required sustained, high-trust

investment in whānau aspirations, capability development and cultural innovation. As the final impact evaluation notes, wave commissioning enabled over 150,000 whānau to activate their own potential, reaching nearly 400,000 people, including some of the most rural and isolated communities in the country (Leonard et al., 2025). The slender funds available for commissioning outside navigation under the current approach will leave most of these whānau unable to access further Whānau Ora investment, and it is unclear whether the new commissioning agency will draw upon this existing network as they chart the next chapter.

To dismantle that infrastructure now – and at speed – carries real and immediate risk. This is not simply the end of a contract; it is the removal of a key node in a self-fuelling network of transformation. The strength of the model lay not just in its funding flows, but in its layered scaffolding: navigators, enterprise coaching, capability workshops, relational brokerage, cultural validation, and a deliberate cultivation of whānau leadership. These components were designed to interact and mutually reinforce, enabling whānau not just to initiate change but to sustain and expand it. As the evaluation observed, wave funding ‘created pathways to long-term transformation’, with initiatives often becoming local hubs of inspiration and connection, catalysing change well beyond the original participants (ibid.).

The hope – and it is a genuine hope – is that the network has matured to a point of inner resilience; that whānau-led entities, connected through shared vision and reinforced by years of capability support, can weather this disruption and find new pathways forward. But we must be honest: removing Te Pūtahitanga as a central node in this ecosystem will send ripples across it. Many funded entities have expressed concern about their viability beyond their contracted investment from Te Pūtahitanga, with only 15% expressing confidence that they could secure future investment from the new Whānau Ora commissioning entity (ibid.).

What is at risk is not just service continuity; it is the cohesion, trust and shared purpose that enable a kaupapa

At a time when social investment is in vogue, the Leonard et al. evaluation offers something rare: evidence that investing in mana motuhake delivers measurable economic and social returns.

Māori ecosystem to function. In contrast to transactional models, wave commissioning was relationally embedded and locally anchored. It cultivated a distributed leadership infrastructure rooted in mātauranga Māori and whānau ingenuity. The decision to replace this model with a faster, more centralised approach risks tearing that fabric. Even with the best of intentions, rapid transitions rarely honour the slow work of relational infrastructure building. And in the absence of transition investment, relational stewardship or continuity planning, the risk is amplified. Put plainly: Te Pūtahitanga was not just a funder, it was a weaver of community capability and leader of deep transformation. Its removal is not a policy refresh; it is a rupture.

Underneath these fault lines lies a fundamental and somewhat intangible concern: the erosion of belief. The dropdown banners that would adorn every Te Pūtahitanga hui stated that belief: ‘Your tupuna believed in you, so too do we’, or ‘Step up – it’s your time to shine’. Whānau Ora is unique in the Crown policy environment in that it deliberately invests in restoring belief – belief within whānau, belief in whānau, and belief that transformation is possible even in the face of long-standing harm. It stands apart from the deficit-laden, compliance-heavy

practices that dominate the social sector. In fact, Whānau Ora may be the only Crown initiative designed to directly counter the psychological and relational damage of colonisation. While other entities – iwi, urban Māori authorities, kaupapa Māori NGOs – are also working to restore mana motuhake, they do so without the scale, mandate or visibility that Whānau Ora provides. Most importantly, they do not carry the same moral weight: that of the Crown accepting responsibility to fix what it broke.

This is not just a technical design choice; it is a point of constitutional and ethical principle. The shift we are witnessing now does not simply reassign contracts; it retreats from that principle. It signals that healing and transformation can be devolved or outsourced, rather than being upheld as core responsibilities of a Treaty-based public policy system.

This retreat also sits uneasily alongside the current focus on social investment. The essence of social investment is to prioritise root causes and preventive action. Yet the changes to Whānau Ora shift the focus away from upstream transformation and towards downstream service delivery. That is not merely ironic; it is self-defeating. Whānau Ora, as originally designed, is arguably one of the most advanced expressions of preventive social investment in Aotearoa’s history. It intervenes not in crisis, but in aspiration. It builds capability, not dependency. It restores the conditions for whānau to flourish, not just survive. In this light, the dismantling or dilution of Whānau Ora’s core kaupapa is not only short-sighted, but actively undermines the broader social investment agenda.

What is at risk, then, is not just a model or a mechanism, but a movement; a policy that dared to align with the dignity of whānau, that trusted communities to lead, and that embodied a living expression of te Tiriti o Waitangi in public policy. What is at risk is the hope and belief that these values might still guide how we build a better future together.

Conclusion

The recent changes to Whānau Ora commissioning should not be viewed merely as a procurement decision or administrative reset. They represent a

deeper re-anchoring of the state. Liu and Pratto (2018) articulate how, when systems face pressure, actors can respond through rupture, continuity, or re-anchoring, stabilising the system by reasserting familiar symbolic, institutional and technological structures. In this case, the state has responded to a decade of Indigenous-led innovation by recentralising control and redefining success through the narrow lenses of compliance, output measurement and state-defined accountability. This is not a rupture, but a deliberate reassertion of colonial-era governance modalities, where the Crown reserves the right to define the terms of empowerment, and relational trust is replaced with contractual control.

What is re-anchored, then, is not just a funding model, it is the state's symbolic and technological dominance within public policy pertaining to Māori wellbeing. Rather than expanding the space for

whānau-led futures, the reconfigured Whānau Ora model risks collapsing the probability space for transformation back into a familiar attractor: one where Māori aspirations are permitted only to the extent that they align with state logics. As Liu and Pratto argue, the power to define legitimacy, allocate resources and set the terms of engagement is central to how colonisation operates, and how it persists. In this light, the Whānau Ora 2.0 changes mark a critical juncture: one where the state has chosen re-anchoring over relational accountability, and in doing so threatens to neutralise one of the few institutional sites where mana motuhake has been given life in the policy system.

If Whānau Ora is to survive in name, it must also survive in character. Too many failed to grasp – or chose not to see – the institutional logic that made it transformational. What we now face is an incalculable opportunity loss, one that

risks remaining invisible precisely because it was so effective. At a time when social investment is in vogue, the Leonard et al. evaluation offers something rare: evidence that investing in mana motuhake delivers measurable economic and social returns. This is not a rhetorical claim; it is a documented fact.

But we cannot get those returns through a stripped-down version of Whānau Ora. What some dismissed as soft or intangible – aspiration, trust, connection – was in fact the engine of impact. If social investment is serious about long-term change, it must look again at Whānau Ora 1.0 and understand what made it work.

That will require deliberate, disciplined resistance to the system's instinct to snap back to default settings: short-termism, control and compliance. The value of what was can still be realised – but only if we are willing to see it clearly, and choose differently.

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Nelly Martin-Anatias and
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Bridging The Gap

faith, fertility and inclusive healthcare in Aotearoa New Zealand

Abstract

In this article we examine the structural discrimination and noticeable absence of religious-based and faith-based support within the healthcare system in Aotearoa New Zealand. Between 2019 and 2021, we conducted interviews with 18 Asian migrants who identified as Sunni Muslims. Their accounts highlighted a significant lack of religious guidance and faith-sensitive support and counselling available at fertility clinics. To address these gaps, we put forward recommendations for policymakers, healthcare providers, government agencies, and ethnic community organisations and leaders. Our aim is to promote more inclusive policies and reduce inequities across the national healthcare system.

Keywords IVF, Asian Muslim migrants, compromised fertility, inclusive healthcare, faith-based counselling

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Declaration: generative AI tools were used in a limited capacity and only to improve the clarity and expression of the writing.

This article builds on a growing body of literature showing that migrant communities face multiple barriers to accessing assisted reproductive technology (ART). These barriers include limited access to specialist care, language and literacy challenges, unfamiliarity with available subsidies, and difficulties navigating complex health systems (Harerimana, Pillay and Mchunu, 2025; Jawad, Hegarty and Al-Khersheh, 2024; Klein and von dem Knesebeck, 2018; Ngondwe and Tefera, 2023). Such barriers are often compounded for minority faith communities, including Muslim immigrants. Research highlights that cultural, religious and normative factors such as preferences for same-gender providers, beliefs about illness and reproduction, and the role of family or community further shape health service access (Afsah and Kaneko, 2023; Inhorn, 2016). The literature on ART in particular underscores the complex interplay of structural, ethical and religious barriers. While studies in Muslim-majority contexts document issues of acceptability and bioethical constraints (Ahmadi and

Bamdad, 2017; Inhorn, 2006; Murad, Daud and Abu Bakar, 2014), there remains a notable gap concerning Muslim immigrants navigating ART in Western settings (Hammond and Hamidi, 2024; Martin-Anatias, 2025; Martin-Anatias and Davies, 2023). Our research contributes to addressing this gap.

Our article expands on the empirical evidence noted above, demonstrating that minority and migrant groups encounter additional barriers to ART access, including high costs, long waiting times, and a lack of culturally sensitive information and support (Harris et al., 2016; Martin-Anatias, 2025; Shaw and Fehoko, 2023). Gendered norms further shape engagement with ART, as women often experience

recommendations for fertility clinics, healthcare providers and government agencies to adopt culturally and religiously inclusive approaches within clinic settings.

Several urgent issues contextualise this work. Since 2010, Aotearoa New Zealand has seen a declining fertility rate, currently at 1.56 births per woman, which represents a drop of about 20% (Statistics New Zealand, 2024). At the same time, the country is becoming increasingly ethnically and religiously diverse. Muslims comprise about 1% of the total population, and this number is expected to grow. Broader demographic projections indicate that by 2043, 30% of the population will be of Asian and Middle Eastern, Latin American and African (MELAA) backgrounds

care. This article contributes to that effort by presenting insights from our research examining the barriers faced by Muslim participants seeking ART interventions to address their experiences of childlessness.

Research project and overview

This article draws on our research with 18 Sunni Muslim migrants living in Aotearoa New Zealand, ranging in age from late 20 to 50 years old. Our Sunni Muslim participants held a relatively traditional interpretation of Islamic rulings, particularly regarding ART, including in vitro fertilisation (IVF). This perspective contrasts with that of Shia Muslims, who often adopt more progressive views on ART and IVF (Inhorn, 2006, 2010).

Our participants are migrants who moved to Aotearoa New Zealand for various reasons, but primarily in search of a better life. Most are either permanent residents or citizens, and this legal status has enabled them to access government-funded ART services. All of them are experiencing either primary or secondary fertility issues and have sought medical intervention at fertility clinics due to difficulties conceiving or compromised fertility. We conducted our research interviews from 2019 to 2021 after securing ethics approval from the Auckland University of Technology ethics committee and Victoria University of Wellington. Our research was funded through a Marsden Fund grant.

We faced challenges when recruiting Muslim participants due to their cultural interpretations and religious beliefs relating to childlessness and ART. The onset of the Covid-19 pandemic in early 2020 further complicated our data collection efforts, leading some potential participants to withdraw due to concerns about participating in digital or online interviews. Despite these challenges, we successfully engaged 18 Muslim participants, which is commendable given the sensitivity of the topic and the impacts of the pandemic. Most interviews were conducted in person, with some facilitated via Zoom. All participants provided both verbal and written consent and were informed of their rights within the study.

The interviews were semi-structured, and the data was transcribed and thematically analysed. The researchers, who

We faced challenges when recruiting Muslim participants due to their cultural interpretations and religious beliefs relating to childlessness and [assisted reproductive technology].

disproportionate stigma surrounding infertility, while men navigate complex social and religious expectations (Hammond and Hamidi, 2024; Martin-Anatias and Davies, 2022, 2023). Taken together, this literature underscores the need to investigate how Muslim migrant couples experience access to ART in Western health systems, how structural and cultural-religious factors intersect to shape their experiences, and how fertility services can be made more equitable, culturally responsive, and sensitive to the specific needs of multiply marginalised populations.

In response to these gaps, this article has three main purposes. First, it aims to explore ART access barriers faced by migrant Muslim women and couples experiencing fertility issues in their new home, Aotearoa New Zealand. Second, it seeks to highlight the structural gaps within fertility clinics and the healthcare system regarding the accommodation of religious and spiritual needs of minority groups. Third, it makes several

(Statistics New Zealand, 2023). These demographic shifts underline the importance of culturally responsive healthcare across the country. This need has already been recognised at the policy level, as reflected in the Pae Ora (Healthy Futures) Act 2022, which mandates the provision of more inclusive and equitable health services.

Given these national trends, ensuring culturally responsive fertility care is not only relevant for Muslim communities but also an essential priority for the wider population. As fertility declines and diversity grows, gaps in current services risk becoming systemic barriers that disproportionately affect minority groups (Statistics New Zealand, 2024). When religious expectations discourage individuals from seeking help, and when secular healthcare settings do not acknowledge or accommodate spiritual and cultural needs, trust in the health system weakens. Preparing for a diverse and heterogeneous population therefore requires proactive transformation in fertility

come from diverse ethnic and cultural backgrounds, met regularly between 2019 and 2021 to discuss and enrich our understanding of the findings, thus enhancing our data analysis and perspectives.

Research findings

Limited access to information on government public funding

Participants experienced multiple barriers to understanding fertility services and public funding pathways. Many reported feeling lost due to the difficulty in finding information about government-funded fertility support. This struggle highlights a significant communication gap within the health system at a broader level. For migrants unfamiliar with Aotearoa New Zealand's health policies, the absence of clear public guidance creates considerable barriers to accessing the support they need.

Although some participants encountered supportive general practitioners who provided clear guidance, many relied on informal networks, such as friends, ethnic community members, or healthcare workers from similar backgrounds, to access basic information. One participant explained:

The first big issue was lacking information. We do not know how to find the information or where to find the information. If you are not familiar with the health system in New Zealand, then you get lost, especially if you are a foreigner. Even locals would not know how to get the information and how to do the IVF and the public funding.

The consequences were significant. Several participants learned about public funding only after surpassing the age eligibility threshold, which meant they could no longer access subsidised treatment. Because age is a key criterion for eligibility, this lack of timely information resulted in irreversible outcomes.

Lack of religious guidance and care for Muslim participants in fertility clinics

At the meso level, participants felt unsupported within clinical settings. Many could not access clear, faith-sensitive guidance about the Islamic permissibility (halal status) of IVF, which is a crucial

component of fertility decision making among Sunni Muslim patients. The absence of such guidance left women and couples to navigate spiritually and emotionally complex questions alone.

One participant described being advised by her fertility specialist to consider egg or sperm donation, an option she believed was prohibited in her faith tradition. As she explained: 'He knew I was a Muslim but he still suggested I do an egg donation, which is an offense to my faith.' From the clinician's perspective, this recommendation may have reflected a standard practice of outlining all medically viable pathways for addressing infertility. However, for this participant, the

These gaps became particularly salient during intimate procedures. One Indonesian Muslim woman who wears a hijab described her uncertainty during egg retrieval:

For a Muslim woman wearing a hijab, how do we approach it? Is it okay to open the intimate part? Sometimes I take off my hijab during examinations, but I feel uncomfortable because they can see my private area. I keep thinking, how should I approach this issue?

Her account highlights the tension between religious obligations and clinical requirements. This issue affects many

Participants perceived that these religious leaders lacked adequate knowledge of [assisted reproductive technology], which prevented meaningful engagement with their concerns.

suggestion conflicted directly with her religious beliefs and left her feeling that her faith commitments were not understood or respected in the clinical encounter. She further noted that 'the clinic did not have the religious information about the halalness (religious permissibility) of assisted reproductive technologies', underscoring a broader absence of faith-based guidance within fertility services.

Participants expressed deep concerns about whether their prescribed assisted reproductive technologies aligned with Islamic beliefs, especially because the procedure involves intimate bodily intervention. Some viewed IVF as potentially conflicting with understandings of destiny, while others were aware of ongoing debates within Islamic scholarship, including differences between Sunni and Shia perspectives (Inhorn, 2006, 2010). Many joined this research in the hope that their experiences would encourage clinics to provide clearer religious guidance in the future.

Muslim women, and its impact is often intensified for women who wear the hijab. For many Muslim women, the hijab symbolises modesty and religious identity (Ash, Tuffin and Kahu, 2019; Siraj, 2011; Soltani, Johnston and Longhurst, 2021). The lack of integrated religious guidance meant participants were left to reconcile these competing concerns without support.

This issue is also compounded by the lack of female doctors who are deemed religiously acceptable to treat female Muslim patients. This highlights the structural need for faith-sensitive guidance and care.

Lack of religious guidance and support for Muslim participants in their communities

In the absence of clinical support, participants turned to local imams. However, gendered norms often limited women's ability to speak directly with male religious leaders, reflecting broader patterns in Muslim communities where

interpretive authority is predominantly male and women's access to such authority is constrained (Mahmood, 2005; Mir-Hosseini, 1999). One female participant shared: 'It's hard for the Muslim women to access the imams (here), as the imams are male dominated, so we cannot approach them directly.'

Even when male participants sought guidance from local imams, several of their inquiries were dismissed. Participants perceived that these religious leaders lacked adequate knowledge of ART, which prevented meaningful engagement with their concerns. A male participant shared:

The local imams may have the religious knowledge, but they don't have the social knowledge, that's what I know, so when asked about IVF, they will straight away

legitimacy (Clarke, 2009; Inhorn, 2012; Luo et al., 2024).

Lack of faith-based counselling

for Muslim participants in fertility clinics

The IVF journey presents significant physical, mental and emotional challenges for our Muslim participants. Coming from a pronatalist culture where having children after heterosexual marriage is considered a rite of passage, these individuals often face stigma from their ethnic communities due to issues with fertility or childlessness (Luo et al., 2024; Martin-Anatias and Davies, 2022). Furthermore, many have reported that their experience with IVF has been difficult. This sentiment was expressed by a Malay Muslim woman in her early 40s, who shared her struggles throughout the process.

Our Muslim participants expressed a strong desire for fertility clinics that can provide a counselling space where their religious beliefs are acknowledged, respected and meaningfully accommodated.

say, 'No, that's not allowed' because they don't have the knowledge to, uhm, because they're scared that they may say the wrong thing, so when they don't know something, they'll just say, don't do [it]. That is why I would say they should be educated through an Islamic scholar who knows about this subject.

Other inquiries were dismissed because the topic was deemed 'too sensitive or controversial', according to the participants. This narrative is consistent with findings that infertility remains shrouded in cultural silence and stigma in many Muslim societies (Inhorn, 1996, 2012, 2016; Martin-Anatias and Davies, 2022). These responses reinforced the pronatalist pressures participants already faced in communities where childbearing soon after marriage is central to women's social

We were indeed experiencing some mental breakdown at that time. It was really bad. It was one difficult journey and if the baby didn't happen, and you have put all your hopes [in that journey]. And you were probably thinking by the time they put the embryo inside you, as a baby, as an embryo, [you had some hope]. But then, they told me in other news that [technology] didn't have the glue to put it in [our womb], [for] the embryo [to stay].

The fragility of the IVF journey was openly shared by a Malay-Singaporean Muslim participant. She candidly admitted to experiencing a mental breakdown, emphasising the intense emotional toll that IVF can take, especially when the outcomes are uncertain or unsuccessful. This

highlights the cumulative emotional exhaustion associated with the process. IVF is not just a biomedical intervention; it is deeply emotional, involving cycles of hope, grief and vulnerability (Hu et al., 2025). This narrative illustrates the delicate balance between hope and heartbreak in assisted reproduction.

Another participant recounted her heartbreaking experiences after multiple failed IVF cycles and miscarriages. The emotional burden was significant, and while the healthcare system acknowledged this by offering free counselling sessions, she found the services too secular and disconnected from her faith. Unfortunately, the faith-based counselling she needed was simply unavailable.

The secular counselling was not asking important religious questions. [They] just asked, 'How do you feel?' And, 'how do you manage?' and, 'tell me about ...'. Basically, it was to stimulate our emotions so we could pour our feelings out. Yeah, obviously, [because I] was asked intensively, in that very moment, of course [I] became emotional and let it out. I mean, I poured [my emotion] out. Because it was a very frustrating journey, you know? But then they didn't really give me that spiritual side because they didn't have any faith, right? The counselling itself was not spiritually based, right? So, they didn't really give us any kind of motivation, or something along the line, no.

She was not alone in her feelings. Other Muslim women in our study voiced similar concerns. Consequently, many opted not to use the (secular) counselling services available to them. Instead, they faced the psychological and emotional burden on their own or relied only on their spouses for support. Ideally, this burden should have been addressed by a trained and culturally sensitive mental health professional.

This narrative highlights a significant structural gap in fertility clinics. While secular counselling is available, there is a noticeable absence of faith-based counselling. Our Muslim participants expressed a strong desire for fertility clinics that can provide a counselling space where

their religious beliefs are acknowledged, respected and meaningfully accommodated. We have learned that there is a sense of isolation following failed treatments, which fertility clinics often do not address or accommodate. When IVF treatment does not result in pregnancy, the impact can be multifaceted, involving emotional distress, medical disappointment, and feelings of being left alone without adequate support (Hu et al., 2025).

This experience reveals more than just personal pain; it underscores a systemic gap in psychosocial follow-up care. There is an urgent need for post-treatment care that is not only psychologically supportive but also sensitive to patients' faith, culture and values, regardless of the treatment's success. This type of care is essential for emotional recovery and for helping patients make informed decisions about their next steps.

Support systems – clinical, community and religious – must recognise this fragility and offer integrated care that includes mental health support and culturally sensitive dialogue. Clinics need to go beyond merely delivering clinical outcomes; they must communicate results in clear, compassionate and culturally appropriate ways, especially for patients from diverse religious, linguistic and cultural backgrounds.

Resilience and self-advocacy in navigating fertility challenges

Despite these barriers, participants demonstrated significant resilience, self-advocacy and resourcefulness. In the absence of accessible clinical or community-based guidance, they sought information independently by consulting online Islamic rulings, joining WhatsApp groups, searching YouTube lectures, and engaging with transnational religious networks (Bunt, 2000, 2018; Campbell, 2013; Mandaville, 1999, 2001). As one participant explained:

I also asked my Indonesian friend via WhatsApp, who has been through the IVF programme in Indonesia and is a Muslim as well, to receive a similar answer. Being legally married should be the first condition that needs to be met.

A male participant similarly described turning to online religious authorities:

As we did not really get the answers on IVF from the local imams, we then used YouTube of the *ustad* we knew from Indonesia. From him, he explained that IVF is *halal* as long as the egg and the sperm are from the married couple.

These digital practices reflect not only participants' determination to make informed decisions but also the inequitable burden placed on Muslim patients to source critical medical and religious information on their own.

Considering these issues, we argue that the resilience shown by Muslim participants is not simply an individual trait but a response to structural gaps in the healthcare system. Their experiences point to the urgent need for culturally and religiously responsive fertility care in Aotearoa New Zealand.

Discussion

The experiences of our migrant participants navigating involuntary childlessness in Aotearoa New Zealand cannot be understood from a single perspective only, given their multi-layered identities (Crenshaw, 1989, 1991). For our

Religious concerns, such as whether to remove a hijab during intimate procedures, were often kept private because participants felt unable to discuss them openly with religious leaders, family or community members.

Participants also relied heavily on spouses, diaspora communities, and emotional ties to family abroad facilitated by social media. These networks often substituted for the lack of faith-sensitive counselling and local community understanding. However, this resilience carried emotional costs. One Malay Muslim participant described experiencing a mental breakdown after repeated IVF failures and miscarriages, while others declined secular counselling because it did not address their spiritual concerns. This left them to manage distress privately.

The persistent shortage of female doctors further shaped participants' strategies. Many preferred to be examined by women, particularly during intimate procedures, and repeatedly requested female clinicians when possible. Their efforts to negotiate clinical encounters illustrate how cultural, religious and medical needs intersect in a system that was not designed with Muslim patients in mind.

participants, being migrant, Muslim and involuntarily childless did not produce separate challenges. Instead, these identities interacted to shape their access to information, their encounters with fertility clinics, and the stigma they faced within their communities. Their newcomer status made the health system unfamiliar; their Muslim identity created a need for faith-sensitive guidance that was rarely available; and their childless status exposed them to cultural and gendered expectations within their diasporic networks.

These narratives reveal that information barriers and gaps in faith-based guidance were not simply administrative oversights but structural issues that disproportionately affected those situated at the intersection of migration, religion, gender and reproductive status (Crenshaw, 1991). Although Aotearoa New Zealand offers advanced medical care, many participants felt that fertility services did not address their core religious question: 'Is this

treatment aligned with my beliefs?’ As a result, Muslim women and couples were left to navigate the ethical, spiritual and emotional complexities of assisted reproduction on their own. At this point, reproductive rights are not well met by the ostensibly fair and equitable systems (Ross and Solinger, 2017).

These structural gaps were further compounded by cultural taboos within their communities. Religious concerns, such as whether to remove a hijab during intimate procedures, were often kept

need for improved access to information. Migrant Muslim communities have faced inconsistent and unclear access to both medical and public funding information. It is essential to establish standardised dissemination practices and foster community partnerships. General practitioners and the related health institutions need to work with the Ministry of Ethnic Communities for the dissemination of the information. Second, the shortage of female doctors has raised discomfort during intimate procedures,

support the government’s commitment to health equity and will foster a fairer, more inclusive healthcare system.

Second, social cohesion helps reduce stigma within ethnic communities. Mental health stigma remains a significant barrier in many ethnic groups. The report of the Government Inquiry into Mental Health and Addiction, *He Ara Oranga* (2018), reported that migrants and refugees faced significant challenges when it comes to access to mental health and addiction services. A 2025 Asian Family Services and Trace Research report revealed that the mental health and well-being of Asians is declining, with life satisfaction dropping from 86.5% in 2021 to 75.1% in 2025. This highlights a concerning trend within Asian communities, as over half of the 1,016 respondents in this survey are at risk of depression. Additionally, Asians often internalise the stigma associated with mental health and depression (Asian Family Services and Trace Research, 2025). This stigma makes it more challenging to seek help and feel included. Therefore, the Ministry for Ethnic Communities should support initiatives aimed at reducing stigma by funding community projects that promote belonging, inclusion and trust. Building social cohesion means ensuring that everyone feels seen, heard and supported.

Third, from an economic perspective, an inclusive policy can reduce long-term mental health costs. The economic burden of mental illness in Aotearoa New Zealand is substantial. The *He Ara Oranga* report estimated the total cost at \$12 billion per year, which is about 5% of GDP. Similarly, a report by the Royal Australian and New Zealand College of Psychiatrists identified \$3.1 billion annually in indirect costs from premature deaths linked to serious mental illness (Sweeney and Shui, 2016). These figures suggest that preventable long-term costs in this context may amount to approximately \$12,000 per couple per year, highlighting the importance of early intervention, access and support for underserved communities. An inclusive policy that recognises and treats individuals as whole beings is not only essential; it is imperative. It embodies the core practice of dignity and inclusion that must be upheld.

To build a more inclusive society in Aotearoa New Zealand, it is important to thoughtfully address the pressing needs of minority groups.

private because participants felt unable to discuss them openly with religious leaders, family or community members. While counselling was available after IVF failure or miscarriage, it was predominantly secular and did not acknowledge their spiritual grief. This created the impression that the system viewed them solely as patients, disregarding their identities as believers, migrants, community members or residents of Aotearoa New Zealand (Martin-Anatias, 2025), and thereby failing to recognise their intersectionality of identities (Crenshaw, 1989, 1991).

The narratives illustrate how Muslim participants negotiate multiple, overlapping identities that remain largely invisible within the health system. The lack of faith-sensitive guidance, together with cultural silences surrounding infertility, produces forms of marginalisation that are both structural and relational. Addressing these gaps requires fertility care that recognises and supports Muslim women’s, and couples’, embodied, emotional and spiritual needs. It is imperative for the government and policymakers to address these gaps.

Policy recommendations

Based on our key findings, we recommend the following actions. First, there is a

which can hinder patients’ ability to fulfil modesty obligations. Addressing this shortage is a necessary structural change. Lastly, it is crucial to provide counselling and religious guidance within clinics. The lack of faith-sensitive support has left patients feeling spiritually isolated, often leading them to seek help from online networks and sources of varying reliability and credibility. Clinics should integrate culturally and spiritually informed care. Implementing these actions will help create a fertility care system that is inclusive, equitable, and aligned with the reproductive rights and lived experiences of Muslim communities in Aotearoa New Zealand.

Why act now?

It is crucial that we act now to ensure equity in health. First, this policy aligns with the Pae Ora (Healthy Futures) Act 2022, which establishes a clear mandate to ‘protect, promote, and improve the health of all New Zealanders’ and to ‘achieve equity in health outcomes’ and healthcare accessibility across all groups, no matter who or where they are, especially for Māori communities. We believe that taking action now will help ensure that ethnic and faith-based communities are not left behind. These recommendations directly

Conclusion: moving forward to build an inclusive future

Stories of migrants and Muslims highlight systemic gaps as well as the resilience of the individuals. Their trust in this country deserves culturally responsive care. Aotearoa New Zealand must work towards a future where no one is forced to choose between their faith and their family. We owe it to these communities to create

a system that not only addresses their medical needs but embraces their entire identity, including their religious beliefs. It is essential to initiate conversations where policymakers drive these reforms with clear mandates and sustained funding. Healthcare professionals should adopt holistic, identity-aware models of care, while faith leaders can provide accessible and up-to-date spiritual guidance. Lastly,

community organisations should lead safe and inclusive dialogues surrounding reproductive health. To build a more inclusive society in Aotearoa New Zealand, it is important to thoughtfully address the pressing needs of minority groups. By committing to these efforts, the country can advance its policies aimed at reducing inequities and foster a sense of pride in its diversity and inclusiveness.

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Chunmin Su and Tim Fadgen

Rethinking Parent Reunification Policy in New Zealand and Lessons from Canada welcoming the skilled, restricting their family?

Abstract

Family reunification remains a socially vital yet politically contested element of immigration policy. This article presents a comparative analysis of Canada and New Zealand's approaches to parent reunification, highlighting Canada's sustained institutional commitment amid neoliberal reforms and contrasting it with New Zealand's episodic suspensions and reactive policy shifts. Applying a lesson-drawing framework, the article examines how Canada's incremental adjustments – such as integrating economic logic without dismantling core family programmes – can inform more coherent and principled policy design in New Zealand. It argues that economic sustainability and family unity need not be mutually exclusive, and that older migrants contribute significant social capital through childcare, cultural continuity and migrant retention. The analysis concludes with practical recommendations for strengthening New Zealand's parent reunification framework, including targeted eligibility criteria.

Keywords parent resident visa, family reunification, immigration policy, skilled migrants, social capital, migration governance

Immigration policy often serves as a barometer of a nation's social values and political priorities. Nowhere is this more evident than in New Zealand's parent reunification framework, which has been characterised by prolonged suspensions, shifting eligibility thresholds and abrupt policy reversals. These fluctuations have not only disrupted pathways for migrant families but also undermined long-term settlement outcomes, and, in some cases, contributed to the departure of skilled immigrants. The resulting policy uncertainty underscores the need for a more coherent and sustainable framework.

Recent demographic data adds urgency to this discussion. In addition to declining population growth (Statistics New Zealand, 2025b), New Zealand is experiencing record levels of outward migration: the number of New Zealanders leaving the country rose by 16% in the past year, while migrant departures increased by 13% (Statistics New Zealand, 2025a). Commentators have warned of a workforce 'hollowing out', particularly among mid-career professionals who 'do the bulk of the work', describing the situation as 'the jaws of death closing' on the labour market (Duff, 2025). In this context of intensifying

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skill loss and demographic pressure, immigration policy plays a critical role in shaping long-term retention.

The most recent development in this evolving landscape is the government's 2025 announcement of the parent boost visitor visa (Immigration New Zealand, n.d.a). This new category provides a multi-entry visa valid for up to five years, with the option of one renewal for another five, allowing a stay of up to ten years in total. Applicants must meet health, income and insurance requirements. Holders remain temporary visitors with no rights to residence, work or public healthcare. They must leave New Zealand between the third and fourth year for a health reassessment and remain outside the country for three months before they can apply for a second term, conditions intended to reinforce its temporary nature.

While this initiative offers greater flexibility and temporary relief, it does not provide a pathway to permanent residence. It operates in addition to, rather than in replacement of, the existing parent resident visa, which remains the only route to permanent parent reunification in New Zealand. As the parent boost scheme is implemented and migrant families continue to navigate a shifting policy environment, there is a timely opportunity to reassess the foundations of parent reunification in New Zealand. This article responds to that opportunity by tracing the historical evolution of the parent resident visa, examining the design choices that have shaped its development, and exploring options for reform.

The parent resident visa has been subject to the most frequent and substantial reforms among New Zealand's family migration categories. Scholarship has linked these shifts to broader policy priorities that have increasingly centred on economic utility, demographic risk and fiscal constraint (Liu and Ran, 2022; Rasheed, 2023). Yet there remains limited research that offers concrete, policy-relevant solutions for strengthening parent reunification frameworks. This article addresses that gap by providing a targeted, comparative analysis with practical implications for decision makers.

The article employs Richard Rose's lesson-drawing framework to evaluate

... studies affirm,
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through complex
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dynamics.

whether and how policy insights from Canada's more stable and inclusive approach to parent reunification might be adapted to the New Zealand context (Rose, 1993). Rose's approach emphasises transferring feasible, evidence-informed elements from one jurisdiction to another, without advocating wholesale replication. According to Rose, lesson drawing begins with determining the transferability of a programme; to explore this, we apply the 'most similar' method of programme selection to compare the Canadian and New Zealand contexts. By comparing the institutional architecture of parent migration policy in New Zealand and Canada, this analysis identifies factors contributing to policy durability and social legitimacy.

This analysis is presented in seven main parts. First, we consider the importance of family reunification – both as a human rights matter and as something critical to the long-term success of New Zealand's immigration policy settings. We then briefly present the analytical approach using Rose's lesson-drawing framework. Following this overview are the case studies of New Zealand and Canada. We then consider three lessons from Canada's

relatively steady and supportive immigration approach to family reunification, before analysing these with insights from the research literature. We conclude by offering insights for New Zealand's family reunification policy aim to enhance family reunification rights and improve policy stability in New Zealand, and create a mutually beneficial situation that serves both government interests and immigrant aspirations.

Why family reunification matters

The ability to live with one's family is more than a private preference; it is a foundational principle embedded in international legal and moral frameworks. The right to family life is affirmed in the Universal Declaration of Human Rights (1948) and the International Covenant on Civil and Political Rights (1966). For many migrants, reunification with parents is not a discretionary benefit but a precondition for long-term integration, emotional stability and community participation in their adopted country.

However, migration research shows that 'family' extends beyond the nuclear model often assumed in policy, encompassing intergenerational networks of care that include parents and grandparents (Andrikopoulos, 2020). Recognising these broader realities is crucial, as they shape how migrants experience belonging and support across generations.

There is a rich and growing scholarly literature underscoring the centrality of family in immigrant adaptation. Assimilation remains a key concept, but recent work has challenged the centrality of this approach. For example, Drouhot (2024) surveyed segmented and neo-assimilation theories, noting intergenerational progress as the dominant trend, while highlighting race and cultural difference as persistent challenges. Yet acculturation frameworks have also become more dynamic. Titzmann and Jugert (2024), for example, argued that acculturation is best understood as a process of change across the life cycle.

Mental health and wellbeing continue to be central in family immigrant adaptation research. Andronic and Constantin (2024) synthesised findings on

acculturation and wellbeing, identifying family cohesion as a critical moderator of mental health outcomes. Allen et al. (2024) further demonstrated that acculturative stress negatively affects self-esteem and depression but positively correlates with family cohesion and familism among first-generation migrants.

Family processes also shape behavioural trajectories. Kang (2025) applied an integrative developmental model, revealing that family structure and racial socialisation explain disparities in immigrant children's adjustment. Social capital remains vital: Park (2025) highlighted barriers to immigrant parental engagement, emphasising the role of networks in educational outcomes. Taken together, these studies affirm, across national, cultural and linguistic contexts, that family operates as a cultural anchor, resource provider and buffer against stress, while also mediating adaptation through complex intergenerational dynamics.

Recent scholarship has also emphasised the complexity of family reunification and caregiving for ageing parents in immigrant contexts. Opanubi and Ade-Oshifogun (2025) identified stress and coping strategies among adult children caring for ageing parents, while Xiao et al. (2024) highlighted the centrality of cultural values in caregiving obligations. Some studies have even considered transnational care, showing how emotional solidarity persists despite geographic distance (Zhang, 2024). As with the broader immigrant adaptation research, systematic reviews of reunification of families with ageing parents underscore the mental health implications of reunification and intergenerational support (Bhatia, McLaren and Huang, 2024), and Cao (2021) provided a theoretical lens on intergenerational negotiations in ageing immigrant families. This scholarship underscores the importance of policies that encourage family reunification for improved migrant outcomes.

In New Zealand, the parent resident visa is the primary pathway for such reunification. It aims to balance social and economic objectives by supporting labour markets, demographic stability and community cohesion. Yet successive reforms have struggled to sustain this

With the country experiencing an ageing population and a declining birth rate, younger migrants are now more reliant than in the past on informal caregiving networks, particularly support from parents and grandparents.

balance. From a policy standpoint, parent reunification promotes family unity, cultural continuity and emotional wellbeing, while enabling labour force participation through informal caregiving. These benefits extend beyond individual households to strengthen migrant retention and intercultural understanding (Chen and Buckingham, 2025; Separa, 2024). Despite this, the caregiving and emotional work parents provide remain undervalued in economic terms.

Family reunification as a policy problem

Despite these demonstrated benefits, family reunification, particularly for parents, has been problematised within New Zealand's immigration system. Over the past two decades, policymakers have increasingly framed the parent resident visa as a fiscal liability, focusing narrowly on health and dependency costs while overlooking parents' social and economic contributions.

Such framing overlooks growing evidence to the contrary. A Ministry of Business, Innovation and Employment Cabinet paper (2019) found that the ability of skilled migrants to sponsor their parents enhances both attraction and retention, with sponsoring migrants 15–20% more likely to remain in New Zealand, staying on average three years longer than those

without sponsored parents. Similarly, the New Zealand Productivity Commission, using the Treasury's CBAX model, showed that while fiscal costs fall on government, the parent category delivers broader social benefits such as unpaid childcare and emotional support that strengthen productivity and wellbeing, with net social gains increasing under larger visa quotas (Chen, 2021).

Recent political discourse reflects a growing awareness of this intersection. The minister of immigration, Erica Stanford, has described the parent category as a key factor in where skilled migrants choose to settle. At the same time, Prime Minister Christopher Luxon has underscored the need to 'incentivise' global talent through more family-friendly immigration settings, noting that it is imperative for New Zealand to 'attract the right people with the skills' to 'deliver significant economic and social benefits for all New Zealanders' (New Zealand Herald, 2025). These remarks suggest that family reunification may function as a social right and a strategic lever in global talent competition. However, the extent to which policy mechanisms reflect this logic remains limited.

Demographic pressures and the case for intergenerational care

New Zealand is not exempt from the demographic pressures affecting other high-income countries. With the country experiencing an ageing population and a declining birth rate, younger migrants are now more reliant than in the past on informal caregiving networks, particularly support from parents and grandparents. Recent evidence shows that grandmothers in Auckland are increasingly providing regular childcare to enable parents to sustain full-time employment (Day, 2021).

From a policy design perspective, recognising these patterns of intergenerational reciprocity offers a strong rationale for more inclusive parent reunification policies. Parents' presence facilitates workforce engagement, particularly for women, and contributes to migrant retention and settlement stability (Chen, 2021; Separa, 2024). Conversely, restrictive parent policies can fracture family networks, increase stress, and drive skilled migrants towards countries with

more supportive family migration frameworks (Nedelcu, 2023; Weiss and Jafari, 2024). Ran and Liu (2020) showed that such restrictions often create ‘forced’ transnational households, depriving families of essential care.

In this context, treating parent reunification as a marginal or discretionary policy stream may be socially and economically shortsighted. We contend that policy settings have been stubbornly myopic, and, as a point of contrast, we offer Canada’s more forward-thinking approach.

Analytical approach

This article applies Rose’s (1993) lesson-drawing framework to guide a comparative analysis of Canadian and New Zealand parent reunification policies. This approach supports policymakers in learning from the experiences of other jurisdictions to improve local policy outcomes. The motivation for exploring the Canadian model stems from growing concern about the instability, restrictiveness and socioeconomic bias characterising New Zealand’s Parent Resident Visa.

The analysis followed three main steps within Rose’s framework. First, the transferability of lessons was considered by conducting a comprehensive programme scan and selecting Canada based on similar institutional, demographic and policy contexts. Second, a comparative case study examined each country’s programme features and implementation outcomes, highlighting the structural and philosophical differences driving divergent policy results. Finally, we drew lessons from Canada’s experience that New Zealand might draw on to enhance the fairness, stability and long-term viability of its parent reunification regime, which will, we maintain, better balance New Zealand’s long-term economic growth goals with maintaining its position as an active proponent of human rights on a global scale.

A comparison of New Zealand and Canada’s family reunification immigration policies: restricting families, or governing with family?

We begin this comparative review of family reunification policy in New Zealand and Canada by establishing the historical context of parent migration frameworks

In 2001 the government introduced a managed-entry framework, allocating 60% of residence approvals to the skilled/business stream, 30% to family sponsorship, and 10% to the humanitarian stream ...

in each country. The section then draws on academic literature to examine how these policies have evolved in regard to sovereign rights, legal obligations and social objectives. In the case of New Zealand, the parent resident visa has undergone a significant transformation over the past three decades. Initially grounded in an inclusive, socially liberal ethos, the policy has shifted towards a neoliberal model emphasising economic self-sufficiency and fiscal restraint. This transition has had far-reaching implications for policy stability, equitable access, and the governance of family reunification more broadly.

The making and unmaking of New Zealand’s parent visa: a case study in policy drift

Economic selectivity in immigration is not unique to New Zealand. Across many OECD countries, neoliberal governance has pushed immigration systems towards market-based criteria, prioritising labour market contribution over social rights. This inclination is particularly evident in family categories, which are often seen as discretionary and high cost. New Zealand’s parental policy reflects this

logic. Income thresholds, randomised ballots and strict eligibility rules exemplify a mode of governance focused on individual responsibility, fiscal control and demographic management. As Foucault (2003) argued, this ‘biopolitical’ approach sorts populations by productivity and utility. Parents, especially those seen as dependent, are increasingly excluded from residence pathways, creating a two-tiered system which admits skilled workers but denies the family structures needed for lasting settlement.

In the late 20th century, New Zealand’s immigration policy adopted a notably family-centred ethos. The 1987 reforms introduced a points-based system favouring human capital indicators such as age and qualifications, as well as community and family sponsorship (Rasheed, 2023; Trlin, 1992). This orientation culminated in the Immigration Amendment Act 1991, which formally established the family category, encompassing spouses, de facto and same-sex partners, dependent children, adult children, siblings and, crucially, parents of New Zealand residents and citizens (Liu and Ran, 2022; Surtees, 2011).

At its core, this model reflected a citizenship ethos centred on social rights, with parents of migrants not only admitted but also granted access to public services and entitlements. As Humpage (2011) noted, this era represented a socially liberal period in immigration governance, in which state recognition of familial bonds took precedence over strict economic filtering. Bedford and Spoonley (2014) further argued that the policy environment during this period prioritised long-term migrant settlement outcomes over short-term fiscal assessments.

The 2001 rebalancing: economic priorities take hold

By the late 1990s, public and political concern over the volume of family-sponsored migrants prompted a recalibration. In 2001 the government introduced a managed-entry framework, allocating 60% of residence approvals to the skilled/business stream, 30% to family sponsorship, and 10% to the humanitarian stream (Ran and Liu, 2020). This move signalled a decisive shift towards an

immigration regime dominated by economic priorities. Bedford, Ho and Lidgard (2005) interpreted this reallocation as part of New Zealand's broader adoption of neoliberal governance, in which the state increasingly sought to maximise fiscal returns on immigration policy.

2012: the rise of income as a gatekeeper

The parent resident visa, established in 2012, closed the sibling and adult child categories and restructured the parent stream into a two-tier system requiring an expression of interest, further limiting sponsorship (Liu and Ran, 2022). This restructuring introduced income and wealth as primary criteria, marking a turning point in assessing familial value and a break from the earlier social-liberal model that prioritised family bonds and settlement outcomes. The 2012 parent resident visa reframed reunification through an economic lens, placing greater weight on financial capacity in determining eligibility.

While the policy still nominally allowed family reunification, emphasising the sponsor's financial capacity significantly narrowed access. Bedford and Liu (2013) highlighted that this move was closely aligned with the skilled migrant model introduced in 2003, reinforcing a cost-benefit rationale that privileged economically self-sufficient households (Liu and Ran, 2022; Merwood, 2006).

2016–22: a dark period of administrative retreat and human consequence

On 11 October 2016, Immigration New Zealand abruptly suspended the parent category, citing fiscal risk and long-term welfare concerns (Ministry of Business, Innovation and Employment, 2019; Woodhouse, 2016). The quota for parent visa approvals dropped from 5,500 to just 2,000 annually, with unallocated spaces quietly redirected to other residence streams. The parent retirement resident visa, with its \$1 million investment requirement, was accessible only to the wealthy. The cap, in turn, determined how many expressions of interest would be selected. Because the system uses a ballot rather than a queue, wait times remain unpredictable, and the number of expressions of interest continues to grow.

[Canadian research shows M]ore than 80% of sponsored parents and grandparents provide regular childcare or household support, which reduces pressure on working-age migrants and makes full participation in the labour force possible ...

Meanwhile, the parent and grandparent visitor visa allowed visits of up to 18 months over three years, offering no path to residency (Immigration New Zealand, n.d.b, 2024). The fallout was deeply personal. Families spoke of parents dying while waiting or becoming too frail to travel or meet health criteria. Health professionals and families with young children – who relied on grandparents for childcare – shared accounts of returning to their country of origin out of frustration (Fleming, 2023; Bonnett, 2025). In 2019, when the policy briefly reopened before being suspended again due to Covid-19, 85% of expressions of interest were deemed ineligible, primarily because children did not meet the \$104,000 annual income requirement. This exclusionary design further entrenched a model of economic filtering under the guise of fiscal sustainability.

2022–present: reopening without reform

The parent category reopened in October 2022 with a raised annual quota of 2,500. However, key barriers persist. Sponsors must now earn at least 1.5 times the

median wage, with the threshold increasing for each additional parent. Expressions of interest are drawn randomly from a growing pool, and the selection odds hover around 2% (Fleming, 2023). Once selected, applicants have only four months to submit their documentation.

Despite modest improvements in processing, the programme's architecture remains deeply restrictive. As Fleming observed, the process has become a game of chance rather than a predictable, rights-based system. Applicants must navigate stringent financial rules and administrative uncertainty, raising concerns about procedural fairness, equity and institutional accountability.

Overall, New Zealand's experience illustrates a clear drift from socially oriented inclusion to fiscal selectivity. Repeated suspensions and restrictive criteria have turned parent reunification from a social right into a conditional privilege, weakening policy coherence and public trust. To place this trajectory in perspective, the following section turns to Canada, another liberal democracy facing similar demographic and fiscal pressures, but one which has maintained family reunification as a stable, rights-based pillar of its immigration system.

Canada's Parents and Grandparents Program: balancing family reunification and economic priorities

Immigration has long been central to Canada's nation-building. Since the 1970s, multiculturalism has anchored family reunification as a legal principle, elevating it to a durable policy objective rather than an optional stream. This institutionalisation meant that even when governments restructured immigration systems, the right to sponsor parents and grandparents was never treated as expendable. By contrast, in New Zealand, family categories have repeatedly been subordinated to fiscal and demographic concerns, with suspensions signalling that reunification is not guaranteed.

Neoliberal shifts and the reframing of immigration value

In the 1990s, Canadian immigration policy began to reflect global trends towards neoliberalism, emphasising labour

Table 1: Comparative overview of parent reunification policy in New Zealand and Canada

Theme/concept	New Zealand—Parent Resident Visa	Canada—Parents and Grandparents Program
Policy stability	Programme suspensions (2016–2022)	Continuous operation since 1970s
Underlying philosophy	Neoliberal framing – family reunification treated as a conditional privilege, tied to fiscal control.	Rights-based framing – family reunification as enduring principle of multicultural citizenship.
Social outcomes	Reduced migrant retention and intergenerational support; weakened social cohesion.	Enhanced migrant retention and labour participation through unpaid childcare and cultural continuity.
Policy signal	Suspension – family reunification not guaranteed; creates mistrust and policy drift.	Continuity – institutional commitment to family unity; reinforces public trust and cohesion.

market needs and economic contribution. Although the Immigration Act 1976 had initially balanced family and economic objectives, subsequent reforms redefined value primarily financially. Parents and grandparents, excluded from the points-based system, were increasingly portrayed as fiscally costly and lacking economic utility (McLaren and Black, 2005).

Despite these shifts, Canada retained the category for parents and grandparents, adjusting eligibility and sponsorship rules rather than dismantling the programme entirely. This incremental approach contrasts with New Zealand’s suspension of its parent resident visa between 2016 and 2022, which prioritised short-term fiscal prudence over policy stability. The Canadian experience demonstrates that fiscal discipline can be achieved without abandoning the principle of family reunification.

Economic logic within family reunification

By 2006, over 60% of Canadian permanent residents were selected through economic pathways, yet the family class remained intact (Cheatham and Roy, 2024). The 2013 reforms formally embedded an economic rationale, requiring sponsors to absorb healthcare and welfare risks (Chen and Thorpe, 2015). In the latest update, according to the 2025–27 Immigration Levels Plan, released alongside the federal budget’s quota reduction, the government aims to increase the intake of economic immigrants while reducing temporary resident admissions, particularly among international students (Government of Canada, 2025). Although these

adjustments reflect fiscal caution, they do not remove the fundamental right to family reunification.

The Parents and Grandparents Program has experienced temporary freezes to manage application backlogs, most recently in January 2025. During these freezes, new applications are not accepted, but those already in the system continue to be processed. This approach contrasts with New Zealand’s, where the parent category has been fully suspended at times, halting all processing and new intakes. Beginning in July 2025, Canada will resume issuing invitations to apply under the Parents and Grandparents Program, reaffirming its enduring commitment to family reunification as a core immigration principle. For New Zealand, this highlights a critical policy option. Economic sustainability can be addressed within family programmes through calibrated design, rather than wholesale exclusion. In other words, cost control and family unity are not mutually exclusive.

Social capital and intergenerational contributions

Canadian research shows that older migrants make vital contributions that go far beyond economic measures. Parents and grandparents strengthen family life through childcare, cultural continuity and civic engagement (Liu and Ran, 2022). More than 80% of sponsored parents and grandparents provide regular childcare or household support, which reduces pressure on working-age migrants and makes full participation in the labour force possible (Côté-Boucher and

Braedley, 2024). This unpaid care, often provided by grandmothers, helps sustain dual-income households and supports long-term settlement (Atique et al., 2025). These contributions improve wellbeing and increase the likelihood that skilled migrants remain in Canada, a lesson that is highly relevant for New Zealand’s efforts to attract and retain talent.

Data further highlights the cultural and social benefits of intergenerational presence. In the context of the Parents and Grandparents Program, the primary motivation for family reunification in Canada is the desire for more frequent contact with sponsors and family members. A significant portion of surveyed migrants under the programme (91%) reported providing emotional support to their sponsor or other family members often or sometimes (Immigration, Refugees and Citizenship Canada, 2024). Between 2006 and 2011, Canada saw a notable increase in non-English language communities, including Tagalog, Mandarin and Arabic (Statistics Canada, 2018). Recent reports have emphasised the role of family reunification in knowledge transfer of cultural traditions and the maintenance of languages other than English and French, further enriching Canada’s multicultural fabric (Immigration, Refugees and Citizenship Canada, 2024). Grandparents often play a central role in language retention, supporting culturally specific childcare that strengthens multicultural societies, while also juggling care responsibilities across borders, a process described as ‘care circulation’ (Atique et al., 2025). As a bicultural and increasingly multicultural society, New Zealand can benefit from similar outcomes if its policy settings support extended family integration.

While economic migration continues to dominate Canadian immigration planning, family reunification remains a publicly supported objective. In 2023, Immigration, Refugees and Citizenship Canada reaffirmed this commitment as part of its post-pandemic strategy (Government of Canada, 2023a). Even in periods of high demand and administrative strain, the programme has remained operational, with adjustments to processing times and intake caps. This contrasts with

New Zealand's more reactive approach, where programme suspension signals uncertainty and diminished public trust. Canada's experience reinforces the importance of institutional commitment and explicit policy signalling in maintaining the credibility of family migration categories.

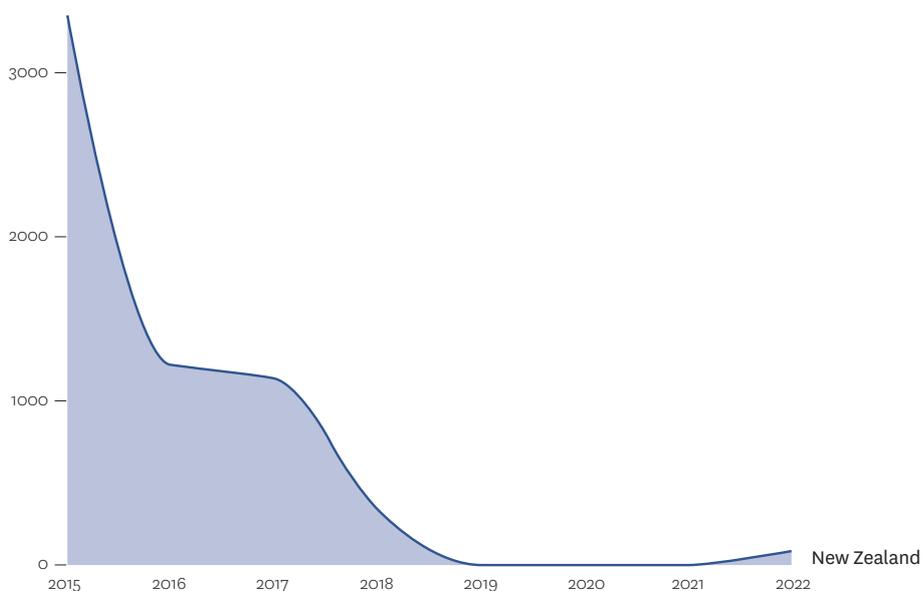
Discussion

A comparison of family reunification outcomes in Canada and New Zealand reveals several notable differences. Canada's sponsorship requirements for parents and grandparents are generally more attainable, with a lower financial threshold despite higher average incomes. In contrast, New Zealand's parent resident visa programme experienced a six-year suspension from 2015 to 2022 (Liu and Ran, 2022), significantly disrupting reunification opportunities. This prolonged halt left thousands of families separated, creating uncertainty, distress and, according to Bonnett (2022), a loss of confidence in the immigration system. Some affected migrants returned to their home countries or relocated elsewhere for more favourable conditions.

Figures 1 and 2 illustrate the trends in final admissions for the two countries' respective parent visa programmes between 2014 and 2022. The data is drawn from Canada's immigration intake report and New Zealand's 'resident decisions by financial year' statistics. The figures exclude application targets (demand) and total applications received, as New Zealand typically sets a much lower intake target than Canada. To account for differences in population size, the analysis focuses on changes in annual admission trends rather than the total number of individuals. This approach allows for a clearer assessment of how each country's policy direction towards parent reunification has evolved over time.

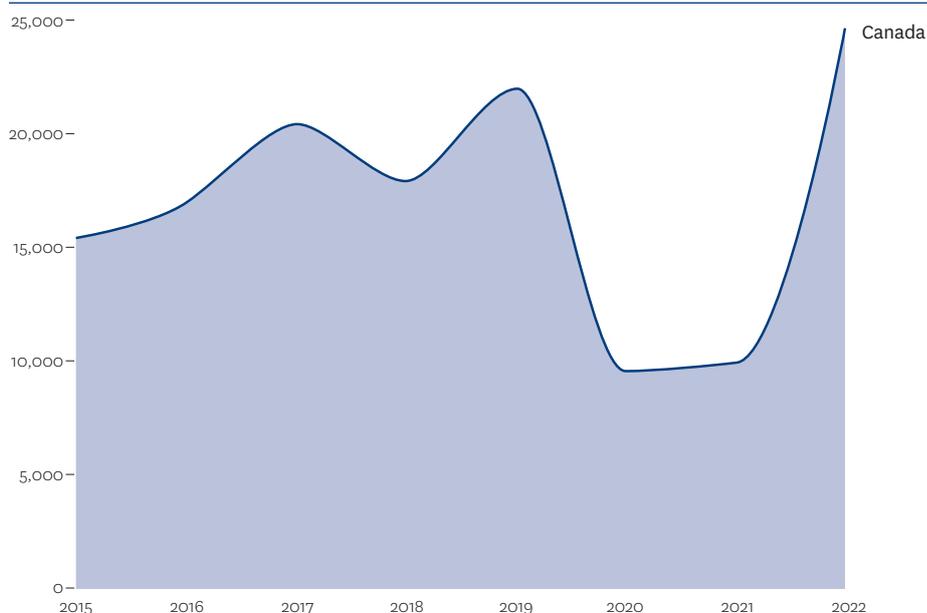
While Canada's Parents and Grandparents Program shows a generally steady upward trajectory, New Zealand's admissions declined sharply after 2016, corresponding with the programme's closure. In New Zealand, restrictions were partly intended to limit the arrival of older parents of skilled migrants and to reduce future pressures on the healthcare, welfare and superannuation systems (Ran and Liu,

Figure 1: Final admissions for New Zealand's parent resident visa



Source: Immigration New Zealand, 2024

Figure 2: Final admissions for Canada's Parents and Grandparents Visa Program (excluding Quebec)



Source: Government of Canada, 2023b

2020). Canada's admission numbers dipped between 2019 and 2021, mainly due to pandemic-related delays, as the 2020 intake was postponed and processed in early 2021 (Government of Canada, 2023b). Nonetheless, the overall stability of Canada's programme contrasts sharply with New Zealand's interruptions. Canada's broader eligibility criteria, which include extended family members, further strengthen migrant support networks and assist integration.

Canada's approach has yielded more stable and inclusive outcomes for family reunification. By maintaining steady programme operation and accommodating a broader definition of eligible family,

Canada has supported stronger family bonds, enhanced social networks, and eased settlement for newcomers. The contrast with New Zealand highlights the importance of policy design in fostering migrant wellbeing and community cohesion. The following section examines how lessons from Canada's experience might inform future developments in New Zealand's parent reunification policies.

Towards a more inclusive and stable family reunification model

There are three key lessons to be drawn from Canada's approach to family reunification. Each offers valuable insights

for New Zealand's immigration policy, particularly in recognising the multifaceted contributions of sponsored parents and grandparents. Canadian scholarship has challenged the narrow economic framing of immigration, highlighting instead the social, cultural and caregiving roles of older migrants. In response, Canadian policymakers have integrated these perspectives into programme evaluations and legislative frameworks, affirming family reunification as a legal right and extending eligibility to grandparents. These reforms not only enhance migrant wellbeing and integration but also counter public misconceptions about economic burden. New Zealand can draw on these lessons to develop a more holistic, rights-based model that reflects the lived realities of migrant families and strengthens the legitimacy of its immigration system.

Lesson 1: Integrate social contributions into impact assessments

A central lesson from Canada's approach is the importance of recognising the full spectrum of parental contributions – not only financial but also social, cultural and caregiving. Canadian scholarship has pushed back against the narrow economic lens imposed by neoliberal immigration regimes. As Bhuyan, Yoon and Valmadrid (2020) argued, policies that ignore the social value of older migrants ultimately undermine both migrant wellbeing and long-term integration outcomes.

Canadian policymakers have responded to this critique. A 2015 government evaluation of the family reunification programme found that parents' presence increased household income, directly or indirectly, by supporting childcare, enabling sponsors to work more or pursue education. These findings provide a strong rationale for including social and intergenerational benefits in New Zealand's social impact assessments. Prior research, including government data, has shown similar benefits in the New Zealand context, yet policy settings have failed to reflect this.

To move forward, New Zealand should develop a more holistic assessment model which values informal caregiving, emotional support and cultural stability as legitimate contributions. This shift would challenge public misconceptions that sponsored

... lessons from Canada suggest a path forward for New Zealand's parent resident visa, one which centres on family wellbeing, institutional stability and long-term integration.

parents are economically burdensome, a narrative that Sholola (2022) recommended countering through transparent public communication campaigns.

Lesson 2: Establish legal foundations for family reunification

A second key lesson is the importance of embedding family reunification rights in law. In Canada, the Immigration and Refugee Protection Act 2001 enshrines family reunification as a core objective. In contrast, New Zealand's immigration legislation offers no such protection; family reunification appears only in policy documents, leaving it vulnerable to ministerial discretion and policy reversals.

Barnes (2018) noted that without legal foundations, family reunification policies are subject to inconsistent implementation and arbitrary changes. For New Zealand, codifying family reunification within the Immigration Act would provide greater policy stability, protect applicants' rights, and strengthen the legitimacy of the family stream. This legislative reform should be accompanied by clear eligibility criteria and agency responsibilities, and appeals processes that prioritise procedural fairness. As van Hulst and Yanow (2014) argued, shaping the discourse around social policies helps define the public's perception of legitimacy and feasibility. In tandem with stronger legal frameworks, a public consultation process would help align family reunification reforms with community values.

Lesson 3: Extend eligibility to grandparents
Finally, New Zealand should consider extending eligibility under the parent resident visa to include grandparents, as Canada has done. Such a change would reflect a deeper understanding of intergenerational care and family dynamics. Under the current framework, grandparents can only qualify for residence if their grandchild's parents passed away before the child turned 18. This restriction excludes most grandparents, even though they play a vital role in many migrant households. It is worth noting that the parent and grandparent visitor visa – and the more recent parent boost visa – already allow sponsorship by a grandchild. This inconsistency raises an important question: if grandchildren can sponsor grandparents for temporary entry, why not for residence?

Extending eligibility to grandparents would also enhance New Zealand's attractiveness as a destination for skilled migrants, many of whom factor family considerations into their long-term settlement decisions. As Yeoh, Graham and Boyle (2002) argued, migration policy is best understood through families' lived experiences and everyday choices as well as national statistics or economic indicators. Incorporating grandparents would acknowledge this complexity and affirm New Zealand's commitment to an inclusive, humane immigration policy.

In sum, the comparison of Canada's and New Zealand's approaches to family reunification policies provides important insights. These practical policy lessons are also well supported by the research scholarship. For example, that Canada's inclusive reunification policies strengthen family bonds and social networks, thereby easing settlement, is consistent with previous research that emphasises family cohesion as a buffer against stress and a contributor to mental health (Allen et al., 2024; Andronic and Constantin, 2024). Our recommendation that programme eligibility be extended to grandparents, acknowledging their caregiving and cultural roles, aligns with Opanubi and Ade-Oshifogun (2025) and Xiao et al.'s (2024) scholarship on intergenerational care and cultural continuity.

We also join critiques of narrow economic framings in immigration policy (Bhuyan Yoon and Valmadrid, 2020) in the

call for New Zealand to integrate social contributions into impact assessments, which underscores the scholarly literature's broader view of family as both a resource provider and cultural anchor, integral to migrant wellbeing and stability.

Conclusion

These lessons from Canada suggest a path forward for New Zealand's parent

resident visa, one which centres on family wellbeing, institutional stability and long-term integration. Reforming family reunification policy is not simply a technical task but a moral and governance challenge. While the 2025 parent boost visa signals a willingness to accommodate family visits, its temporary nature underscores the need for more profound structural change. By integrating non-

economic contributions, legislating core family rights, and expanding eligibility to reflect intergenerational realities, New Zealand can build a more equitable and durable immigration system that reflects the values it claims to uphold.

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Disability in a Changing Climate

disability leadership and inclusion in climate adaptation in Aotearoa New Zealand

Abstract

Disabled people and their whānau are significantly affected by climate change and the growing need for adaptation measures. Despite this, globally, in both research and policymaking, there is less focus on disability than on other disproportionately affected communities. The intersection between climate change and disability is therefore of high relevance to policymaking for adaptation. This article discusses the findings of scoping research that identifies key areas of concern related to climate change in the disability community in Aotearoa. It concludes with a brief discussion of opportunities for disabled leadership in addressing the challenges of adaptation.

Keywords climate adaptation, disability, emergency management, climate justice

There is clear and growing evidence that disabled people¹ disproportionately experience the negative impacts of climate change, as well as mitigation and adaptation policies, at multiple scales (Bell et al., 2024; Stein et al., 2024). Disabled people experience higher mortality and greater exposure to risk from climate disasters (Stein et al., 2024), and from impacts such as higher temperatures, the increased prevalence of zoonotic diseases, and food, water and energy insecurity (Jodoin, Ananthamoorthy and Lofts, 2020; OHCHR, 2020). Climate change mitigation and adaptation policies may also have unintended negative impacts, reducing accessibility, exacerbating or creating new barriers, or reducing the affordability of necessities (Hamraie, 2021; Jodoin, Ananthamoorthy and Lofts, 2020; Stafford, Vanik and Bates, 2022). Thus, disabled people are more likely to experience the disruptive and dangerous impacts of climate change, as well as unintended negative impacts from policies aimed to reduce emissions and adapt to a changing climate.

Despite this, disabled people are frequently excluded from and denied opportunities to participate in decision making and policymaking on climate

issues (Bell et al., 2024). Globally and in Aotearoa New Zealand there is a need for more in-depth and disability-led research to understand these challenges and potential approaches to develop more just, inclusive and accessible climate action, particularly for adaptation (Jodoin et al., 2023). For example, one global study analysed over 1,682 adaptation initiatives and found that only 1% of initiatives considered disabled people (Araos et al., 2021).

A number of structural and societal barriers affect disabled people's lives and are interconnected with climate change issues, including ableism, disablism,

According to the 2023 Household Disability Survey, 17% of the Aotearoa New Zealand population are disabled (Statistics New Zealand, 2025). Disabled people are more likely to earn lower incomes than non-disabled people and less likely to have formal higher educational qualifications such as postgraduate degrees (Statistics New Zealand, 2018). In Aotearoa New Zealand disabled people are more likely to report experiences of discrimination, to rent, live in housing with mould problems and to report that their housing is unsuitable for their needs (ibid.). Tāngata whaikaha Māori – Māori disabled people – face the impacts of both ableism and

adaptation issues disabled people and the disability community are facing in Aotearoa New Zealand.² This included data from 15 semi-structured interviews and four online open-ended survey responses. Of the 19 participants, 16 people identified as disabled and two people identified as part of the disability community, as having lived experience of disability, or as a whānau member of someone with a disability.³ One person identified as not disabled but worked in the disability sector. Interviews were analysed using thematic analysis to identify the key challenges and opportunities in relation to disability and climate adaptation, as well as gaps for future research.

The interview data is supplemented with document analysis of a dataset of 123 publicly available central government policy documents related to climate change from 2000 to 2023, including legislation, Cabinet reports, consultation documents, advice reports, policy summaries, briefing papers and draft plans. Of the 123 documents that met the criteria for this analysis, 29 included at least one mention of disability. The relevant content of these documents was then analysed thematically to capture how disability was framed, how disability was discussed in relation to climate change, whether other forms of marginalisation were included in this framing, and whether the United Nations Convention on the Rights of Persons with Disabilities was mentioned and if so how. Seven documents were found to have substantial content relating to climate change and disability, while the remainder included cursory or brief mentions of disabled people and the disability community.

This research is a scoping study and is not intended to provide a comprehensive analysis of the many diverse climate adaptation issues facing disabled people and their communities. More research is needed, particularly for communities that are multiply marginalised, such as tāngata whaikaha Māori. Findings from this research provide a preliminary insight into the understanding and experience of climate change impacts in the disability community that can help inform wider discussion and work towards more inclusive climate adaptation in Aotearoa New Zealand.

Interviewees in this research described the increased and disproportionate impact of climate change on the everyday lives of disabled people in Aotearoa New Zealand and the challenges in navigating future risks.

barriers to employment, education and healthcare, and discrimination (Stein et al., 2024). It is important that these barriers be understood within the social model of disability, which frames the disadvantage faced by disabled people as not inherently caused by impairments but rather by the organisation and structure of society (Barnes, 2018). A human rights approach is also vital for recognising disabled people as entitled to 'legal protection against discrimination and to achieve substantive equality with their peers without disabilities' (Jodoin, Ananthamoorthy and Lofts, 2020, p.78). Intersectionality is central in these discussions, as disability amplifies and multiplies the marginalisation experienced by individuals and communities (Saxton and Ghemis, 2018). Therefore, in considering climate justice, and the policy implications of such efforts, disability is a key part of the wider moral and justice implications of climate change (Bell et al., 2024; Sultana, 2022).

discrimination against disabled people, and racism and the ongoing impacts of colonisation (Jones et al., 2024). In the 2023 Household Disability Survey, 21% of the Māori population are reported as disabled. Māori communities are also more likely to be affected by climate change, and therefore face compounding risks and climate impacts (Awatere et al., 2021).

In this article I discuss the findings of a research project which sought to understand the key climate adaptation issues that are of concern to the disability community. I first outline the areas of concern raised during interviews relating to the impact of climate change on disabled people. I then argue for the need to support disability-led approaches, as well as the importance of greater inclusion of disability in climate change policy and action.

Methods

This article draws on a qualitative study that aims to understand key climate

Climate adaptation and the disability community in Aotearoa New Zealand

Interviewees in this research described the increased and disproportionate impact of climate change on the everyday lives of disabled people in Aotearoa New Zealand and the challenges in navigating future risks. Disabled people who are multiply marginalised, older, or who experience cognitive, learning or neurological disabilities were described as being further disproportionately affected by these climate impacts. As one person put it, 'the deck is stacked against people'. Key areas of climate adaptation concern discussed during interviews were: preparedness, response to and recovery from climate-related emergencies, managed retreat, health impacts, and the unintended impacts of adaptation policies. Across all issues raised, challenges and frustrations in being unable to access accurate information in different formats were central.

Responding to climate-related emergencies

The impact of climate-related disasters, from preparedness through to recovery, was one of the most significant concerns for disabled people across the vast majority of interviews. There was a clear feeling that climate-related emergencies such as floods and cyclones are already disproportionately affecting disabled people and exacerbating existing inequities in the emergency management system. While there are a number of initiatives underway to improve disability representation and accessibility in emergency management and disaster response at different scales in Aotearoa New Zealand (see, for example, NEMA, 2024), people involved in this research considered more resources and efforts vital given the breadth of challenges, and raised concerns about the extent of climate change impacts from the increased frequency and severity of these events.

The challenges identified across emergency preparedness, disaster response and disaster recovery are varied and range from barriers to accessible information at different stages of an emergency to financial constraints on preparing as households, and a need for more inclusive disaster risk reduction programmes. For many disabled

people, there are continued barriers to accessing safe and timely evacuation during these emergencies, especially for those with mobility impairments. These barriers can extend to the accessibility of shelters or civil defence centres, which contributes to the experience and perception of disabled people not being prioritised. This is reinforced by recent research following the 2023 Cyclone Gabrielle response in Tairāwhiti, which found significant challenges for people with disabilities and chronic illnesses in evacuating safely and quickly. The authors report that 'some participants recalled

option during a disaster (OHCHR, 2020; Saxton and Ghenis, 2018). While there is work being done to improve emergency information in New Zealand Sign Language, Easy Read, braille and other formats (NEMA, 2024), interviewees felt that there is more work needed to improve the consistency and availability of accessible formats for disabled people across the country.

Recovery from emergency events was also discussed as a time in which there is a need for greater focus and prioritisation on the needs of disabled people. Delays in repairing damaged infrastructure such as

Being able to access timely and accurate information is vital so that people can make informed choices about their best option during a disaster

being overlooked in evacuation procedures, as well as mobility issues that put those with disabilities at heightened risk' (Thorpe et al., 2025, p.1280).

Emergency events are likely to disrupt electricity and water supplies, as well as access to medical services and supplies, which is a significant concern for many disabled people. This includes not only those who are medically dependent on electricity but also those who rely on access to power to charge batteries for accessibility or mobility aids, such as power wheelchairs. These issues are well reported in the international literature (for example, Frederick, 2022; King and Gregg, 2022) and reflect widespread barriers to inclusion and equitable access during emergencies both globally and in Aotearoa New Zealand.

Similarly, some people shared that in recent emergency events it was still not standard practice for public emergency information, such as social media posts, to include content related to the accessibility of evacuation shelters or procedures. Being able to access timely and accurate information is vital so that people can make informed choices about their best

footpaths can have a further impact on the ability of people with mobility impairments to fully participate in their community. Temporary housing was also raised as an issue of concern: there is often a lack of consideration for accessibility in the design and infrastructure of options available to those who lose their homes. Research after the 2010–11 Canterbury earthquake sequence reinforces these concerns, demonstrating the ongoing implications for access and social inclusion that have been disproportionately experienced by disabled people in the medium to long term, resulting in social isolation and a reduction in quality of life (Bourke et al., 2022).

Overall, many interviewees felt that this range of impacts across different facets of emergency response and recovery demonstrates the need for greater representation and engagement with disabled people and the wider disability community in decision making for preparedness, response and recovery initiatives. Thorpe et al. (2025), reflecting on research in the aftermath of Cyclone Gabrielle in 2023, and Phibbs et al. (2015)

writing following the 2010–11 Canterbury earthquakes have also stressed the importance of greater connectivity between disability and health organisations, the community and emergency management, and a need to review existing plans, policies and infrastructure to include the needs of disabled people.

Managed retreat

Issues of recovery intersect with a further area of significant concern for disabled people: managed retreat. Managed retreat and relocation encompasses moves to proactively or reactively relocate households and communities away from areas at high risk from hazards, including,

Concerns were also raised around unmanaged retreat and insurance retreat, and the impact this may have on disabled people on lower incomes. There is a significant concern that as insurance is withdrawn from coastal areas, housing in uninsurable areas will be dominated by cheaper rentals and this will increase the proportion of disabled and other vulnerable households in areas with higher risks. As one person said: 'My main concern is ... we'll end up with our most vulnerable people in our most hazardous areas, and with the withdrawal of infrastructure from those areas as well there might not be doctors' clinics, town halls or shops.' Another concern is that without the input and involvement of

communities, particularly through exposure to heat and an increased prevalence of zoonotic diseases and pandemics (Stein and Stein, 2022). Most people involved in this project mentioned the increasing severity and frequency of heatwaves as a specific concern for many disabled people. Existing challenges disabled people face in relation to accessing safe and healthy housing will also likely be exacerbated. This was framed in relation to both extreme heat and other weather-related conditions, such as high humidity and cold weather. Disabled people are more likely to live in housing that is mouldy or unsuited to their needs (Statistics New Zealand, 2018) and there is concern that climate change may exacerbate and amplify the impact of these housing conditions.

Issues of food insecurity are also important. Some interviewees described how recent events such as Cyclone Gabrielle had increased food prices and thus reduced affordable food options, especially for those on restricted diets. The potential for climate change to have a negative impact on food security for disabled people is highlighted by research which found that disabled children were more likely than non-disabled children to live in households that run out of food often or sometimes or to live in households which use foodbanks, indicating the depth of existing inequities in access to food for disabled households (EHINZ, 2024). These climate-related health impacts could amplify and entrench existing health inequities in Aotearoa New Zealand, a concern that is echoed by Bennett and King (2018) and Environmental Health Intelligence New Zealand (EHINZ, 2024).

Disproportionate impact of adaptation policies

Globally, there is increasing awareness that policies designed to support climate change adaptation or mitigation may have unintended impacts on disabled people that increase barriers to their participation in society or further entrench inaccessibility (Hamraie, 2021; Stafford, Vanik and Bates, 2022). In the interviews, discussion of the impact of adaptation policies was mostly around housing and transport policy. Interviewees identified

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but not limited to, flooding and sea level rise (Hanna, White and Glavovic, 2021). Managed retreat was raised as an issue that is likely to have a significant impact on disabled people and communities. Yet rarely, in the experience of interviewees, were these impacts explicitly considered or consulted on by researchers, authorities and governing bodies. The issues raised for disabled people in relation to managed retreat are multifaceted and include: the need for adequate compensation for housing with accessibility modifications; challenges around relocating and maintaining connections with support and care networks; availability of information on managed retreat and risk in accessible formats; and the need for more involvement of disabled people in planning and decision making on managed retreat.

disabled people in decision making for these issues, challenges could arise with the design of relocation and compensation schemes. A particular concern raised was that many disabled people on low incomes or the supported living payment may not have insurance. This may pose issues for managed retreat schemes that are premised on the homeowner holding current insurance, such as played out in the residential red zone in Christchurch after the 2010 and 2011 earthquakes (Jones, 2014). A lack of insurance cover or under-insurance may also contribute to people being unable to move or to afford properties with accessibility modifications following disasters.

Health impacts

There are significant concerns around the potential for climate change to adversely affect health outcomes across disabled

possible co-benefits of improving accessibility in designing adaptation policies, such as using universal design principles in new housing developments planned as part of relocating communities at risk of climate impacts. However, many people spoke of their frustration that these design approaches are often not included and instead new housing is built without consideration of accessibility. In the experience of some, new housing was both less accessible due to a focus on multi-storey townhouses, and less adapted to climate change due to building design causing health concerns as a result of extreme heat (Bell, 2024).

Approaches to designing urban environments to support active transport or transport mode shift were another area where disabled people experienced additional challenges and barriers. There was broad support for these initiatives, but interviewees noted that without the active involvement of disabled people, these efforts can increase accessibility barriers or costs, ultimately leading to a disproportionate burden on or cost to disabled people. As one person said when discussing their experience of inaccessible urban design experiments that removed vehicle access to promote walkable spaces, there are 'a lot of assumptions made that everyone can just pop down the road'. Research by Doran et al. (2002) has also shown support from disabled people in Aotearoa New Zealand for pedestrianisation efforts if these modes are safe and accessible.

For many, these issues were connected to forms of exclusion that limit the possibilities for disabled people to participate in decision making on climate change. Interviewees frequently described their experience of barriers to participating in central and local government submission processes and in accessing submission forms and government policy documents. This is especially a challenge for blind and low vision people when forms and policy documents are not accessible for those using screen reader technology. It is also important to note that several interviewees raised concerns that some disabled people have a lack of trust in government agencies and officials involved in roles such as emergency management due to previous negative experiences. These dynamics will need to be

carefully considered and navigated in climate adaptation and emergency management policymaking alongside and with the disability community.

Opportunities for disability leadership and action for climate adaptation

While disabled people are significantly affected by climate change, there is often an emphasis on vulnerability, rather than capacity and expertise. Analysis of central government climate policy documents as part of this study found that disabled people and disability communities have been largely framed as a group that is vulnerable to, and disproportionately affected by, climate change. While these documents

disabled people and their communities. The need for climate adaptation policymaking and research more broadly to be disability specific and connected to the everyday lives of disabled people is critical for building disability-led approaches that support empowerment and agency, rather than a sense of passive vulnerability to increasing climate risks.

The potential for disabled people to lead and contribute to climate adaptation was frequently highlighted in discussions and interviews as part of this research. Experiences of disability and vulnerability mean that disabled people have skills and capacity in adapting to challenging circumstances, as well as thinking through

Collaborating with and exchanging knowledge and expertise with disability communities across Aotearoa New Zealand and the world will allow us to work towards a more diverse and inclusive future for climate action.

recognise the disproportionate impact of climate change on people with disabilities in Aotearoa New Zealand, it is worth noting that these mentions are still largely cursory. Furthermore, many use the term 'vulnerability' or 'vulnerable' to frame the impact of climate change on disabled people, often in a passive manner. Understanding vulnerability is an important and much needed contribution to this discussion, but there is also a need to highlight the agency and expertise of disabled people in contributing to society-wide efforts to respond and adapt to climate change.

Relatedly, there is a clear need for initiatives, policy and resources to develop and support disabled leadership in response to these challenges, particularly for climate adaptation (Bell et al., 2024). Disabled people participating in this research clearly articulated the need for more accessible risk and hazard information in different formats that connects to the needs of different

problems in different ways. As one person said, 'I have to think of things nobody wants to happen, I have to think about very different things to non-disabled people'. Another person commented that disabled people contributed 'different insight – they might have different resources available, they might be the only house that has power because they're vulnerable'. Parallels were raised with the responses that Māori communities and marae frequently undertake after disasters to support and manaaki, or care, for affected communities.⁴

The findings of this research identified a number of opportunities for those working at different scales of government to support climate adaptation leadership and action alongside disabled people and the disability community. This includes:

- Invest in and build relationships between the disability community and policymakers and decision makers at local and national scales.

- Frame and develop climate policies in a way that is relevant and engaged with disabled people's everyday lives.
- Provide resourcing and invest in disabled people and disabled persons organisations to lead and develop accessible policy and decision-making processes for climate adaptation and emergency response.⁵
- Address accessibility barriers and provide information in multiple formats.
- Resource disabled people and disabled persons organisations to fully participate in and engage with formal decision-making processes at all levels of governance on climate issues.

There are also a number of important areas of future research to support and build understanding of the specific challenges disabled people face in responding to climate change and the possibilities for building adaptive futures. Participants suggested a number of priority areas for future research, including developing and trialling disability-inclusive emergency management approaches, understanding the challenges for people living in rural communities, on papakāinga or in remote areas, and greater focus on data to understand demographics and the risk exposure of disabled people to extreme weather hazards and climate impacts. Research currently underway by the author

in collaboration with Sarah Bell and Áine Kelly-Costello as part of the UK-based Sensing Climate research programme includes a case study in South Dunedin that aims to provide more specific and detailed understanding of disabled people's experiences in severe weather events and the opportunities for disability leadership in planning for climate change futures.

Collaborating with and exchanging knowledge and expertise with disability communities across Aotearoa New Zealand and the world will allow us to work towards a more diverse and inclusive future for climate action. People involved in this research were clear that disabled people have the knowledge, expertise, experience and skills to contribute significantly to climate change responses and adaptation. Responses to climate change that are disability-led can enable adaptive, creative and diverse opportunities to respond to these challenges in a way that leaves no one behind (Bell et al. 2024). Furthermore, leadership from communities of people who are multiply marginalised should be at the forefront of inclusive action on climate change (Stein et al., 2024). In the Aotearoa New Zealand context, this also means placing a central focus on tāngata whaikaha Māori leadership and te Tiriti partnership between mana whenua and tāngata tiriti (Bray, 2023).

- ¹ This article largely uses the term 'disabled people' in line with person-centred language and the social model of disability (Barnes, 2018). However, it is important to acknowledge that use of terminology (for example, 'persons with disabilities') varies with group and individual preference and in different contexts.
- ² The findings of this research were first published as a research report as part of the Resilience to Nature's Challenges National Science Challenge. For more detailed discussion, see Cretney, 2025.
- ³ Three participants identified as Māori. The relatively small number of participants for this project means there are gaps in terms of representation from some communities, including tāngata whaikaha Māori, Pasifika disabled people and disabled people from a migrant and refugee background. There is a significant need for more focused climate research led by and in collaboration with these communities.
- ⁴ See also the importance of marae in providing rapid response following disasters, as seen in 2023 with Cyclone Gabrielle (Kātene, 2025).
- ⁵ Examples of emergency management resources produced by disabled people and disabled persons organisations are the Disabled Persons Assembly booklet 'Don't Be Scared, Just Be Prepared' (<https://tinyurl.com/2s48bmsy>) and videos produced by the IHC and Civil Defence Emergency Management Canterbury on emergency preparedness (<https://tinyurl.com/yxu848n>; <https://tinyurl.com/59h3ach3>). The Wellington Regional Emergency Management Office has also released a disability inclusive emergency preparedness guide based on the Australian person-centered emergency preparedness model (<https://tinyurl.com/4hk2w52n>).

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