Submission to the Ministry for the Environment on the National Policy Statement for Indigenous Biodiversity

Kāpiti Coast Biodiversity Projects Inc.
Kāpiti Coast Biodiversity Projects Inc. (KCBP) is an organisation formed to fund and manage large environmental projects on the Kāpiti Coast. A very large project ($300,000) that initiated the organisation centred on protected land from Pukerua Bay to Raumati and included Whareroa Farm, Queen Elizabeth Park, Nga Uruora Escarpment and Nga Manu Trust. Our reason for existing is the preservation and enhancement of the indigenous flora and fauna of the Kāpiti Coast.

The National Policy Statement for Indigenous Biodiversity

The State of Indigenous Biodiversity
Notwithstanding the creation of MFE and DoC and the RMA, we have seen a steady decline in biodiversity. Habitat loss has continued. Many areas have become weed or predator infested while in other areas, introduced fauna has simply taken over causing a decline in the habitat for indigenous fauna. Examples of the latter are Canadian geese and Australian wallabies. Many native species have declining populations. As an example, we know lizard populations are under threat in the Wellington region (http://www.gw.govt.nz/assets/Our-Environment/Environmental-monitoring/Environmental-reporting/Conservation-status-of-lizard-species-in-the-Wellington-region.pdf)

With climate change imposing its conditions on natural habitats, the dramatic increase in residential areas over the last few years and the intensification of farmland, without a strong counter measure such as the indigenous biodiversity policy statement, the preservation of indigenous biodiversity is difficult to imagine.

Many of the KCBP live on the Kāpiti Coast and see indigenous fauna in backyards daily. That includes kereru, riroiro, korimako and tui. We wish that to continue, and preferably, to increase. In other areas of New Zealand, people have to travel to a regional or national park to see these birds and do not expect to see them in their backyards. In order for urban and rural biodiversity to grow, all remaining native bush areas and wetlands need identification and protection.

Coverage of the National Statement
The document should cover all public and all private conservation land and include marine and freshwater environments.

Public Land
Much of the conservation estate has not been classified because that would be a high cost exercise. Further, much public land is not in – nor will be classified – in the conservation estate eg. QE Park, KiwiRail land, NZTA owned land, and all the SOE owned land). If the National Policy Statement for Indigenous Biodiversity applied to all public conservation land, activities on conservation land that might affect biodiversity could be noted during planning. Whilst it cannot happen all at once, restoration of the estate over time (see below), should see a continuous improvement of that estate and hopefully biodiversity. This requirement would not be necessary if all of the conservation estate had been classified, but it has not been. Because of the urgency of protecting native species, we ask that the precautionary principle be invoked. Public conservation land should be deemed to be valuable habitat unless it can be shown not to be.
Private land
Much of the valuable, unprotected, remnant natural areas are on private land. These include native forest, tussock lands, wetlands, dunes and estuaries. Whereas some areas may change from private to public ownership without any change in habitat, often important ecologies and habitats are lost. Whereas we might well know the difference, indigenous fauna and flora do not.

Marine and freshwater
The National Policy Statement for Indigenous Biodiversity is land based. It should be extended to marine and freshwater. They need the same identification and protection as land based Significant Natural Areas (SNAs). They need restoration, enhancement and environmental bottom lines. Climate change (see below) will put greater demands on these areas as well.

Significant Natural Areas
We agree with the method of identification and robust protection of all with involvement of landowners. Our understanding is that Kāpiti Coast District Council (KCDC) has undertaken this exercise engaging a local expert and involving landowners. We further understand that, with the passage of a few years, SNAs have been accepted and consequently there has been much less dispute about what can and cannot be developed resulting in less cost for both developers and council.

Eco corridors
A protected, but isolated, patch of bush is of little ecological value. Its value is multiplied if it is connected to other areas via a functional eco corridor. Size is one benefit from connection, but the provision of habitat diversity is another. Two or more areas connected may bring significant diversity. Eco corridors can often be arranged along the paths of waterways. Most indigenous fauna is mobile and that mobility needs to be catered for in the biodiversity statement. This should be part and parcel of deciding and negotiating SNAs.

Restoration and enhancement
SNAs and corridors need to be looked after, so they do not suffer further decline. Most will require to be restored and enhanced. We have been associated with restoration projects and some of our members have observed Key Native Ecosystems managed by Greater Wellington Regional Council. Based on those experiences, we believe that SNAs would benefit from publicly consulted regional strategies to improve them, link them and bring biodiversity back to them. We would expect councils to support the strategies by undertaking activities that public groups cannot manage or fund. KCDC has two such staff who undertake activities like this on various Kāpiti projects and have made a significant difference e.g. large scale weed control before planting and physical activities that volunteers can no longer manage.

Bottom Lines for Biodiversity
A National Statement on Indigenous Biodiversity should include clear national standards with strong bottom lines for biodiversity. These will benefit the RMA process. Both developers and protectors will know where they stand, and decision makers will be able to decide based on those standards.

Climate change
Climate change is bringing many challenges. Some people will demand that natural places be turned into food production to feed ourselves or to profit from feeding the world. There will be increasing pressure to produce renewable energy whether it be new hydro schemes, windfarms or growing crops for biofuel. Natural places will also be in demand to supply water to our communities, industries and farms. One significant aspect of climate change is the effect on biodiversity, as species fail to adapt quickly enough to rising temperatures,
or lose their habitat. Climate change will cause a biodiversity emergency. We have seen an example in the bush fires of Australia. Before climate change effects bite too hard, New Zealand should set up a strategy and system to protect its remaining indigenous biodiversity. We see the indigenous biodiversity statement as being part of that process.

**Endemism**  
New Zealand has a high level of endemism meaning that extinction of an NZ species is generally not localized to our country. It is a world extinction. That should increase the need to protect our indigenous biodiversity.

**Urgency**  
While it is important to produce the best statement we can, there is a sense of urgency about this statement. It has been absent from the RMA process for a long time and the declines in indigenous biodiversity are ongoing.

There was a time when extinctions were rare and news worthy events. That is no longer the case. They are now just a statistic.

We ask that the ministry act with some urgency.

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