



Submission on Proposed National Policy Statement for Indigenous Biodiversity

Question 1: Do you agree a NPSIB is needed to strengthen requirements for protecting our native plants, animals and ecosystems under the Resource Management Act 1991 (RMA)? Why/why not?

Yes, however it is important to ensure the focus is on the right direction.

As an organisation that supports community led conservation in the Bay of Plenty, we feel strongly about national capability to support community action for conservation.

Much community work is focused on the removal of pests (both plants and animal pests) and this work is essential, especially as we work towards Predator Free 2050. We do not think the proposed NPS reflects this aspiration well.

Question 2: The scope of the proposed NPSIB focuses on the terrestrial environment and the restoration and enhancement of wetlands. Do you think there is a role for the NPSIB within coastal marine and freshwater environments? Why/why not?

We support any policy that has a strong focus on increasing indigenous species populations and restoring species diversity across all habitat types. We however also need to have a good understanding at each regional level of the current trends and where the most value add is needed to direct resources.

Question 3: Do you agree with the objectives of the proposed NPSIB? (see Part 2.1 of the proposed NPSIB) Why/why not?

We have some concerns around the objectives as they currently stand. These include:

- Lack of acknowledgement for the biggest influence on biodiversity decline - pest and weed incursion.
- A lack of alignment with decades of significance assessment work based on agreed significance criteria.
- We question if the position aligns with 'actual' data (LCDB) on trends on indigenous land cover or observations of fauna populations across all regions for NZ.
- Does not link well to other legislation like the RMA, existing SNA regulation etc.
- Ignores indigenous vegetation increases/re-establishment due to private landowner activity (e.g. wetland restoration, riparian margin retirement/planting etc).
- Ignores vegetation change due to market forces.
- Will create conflict for high growth areas with areas designated for urban development. There is likely to be increased work for regional and local council's and we need to be sure this leads to better outcomes and does not focus limited resources in the wrong direction.

- What evidence base is being used for each region that shows indigenous biodiversity is declining? Some regions including the Bay of Plenty reflect an increase.
- Currently not a strong enabling tool for community conservation efforts which are critical in NZ.

Question 43: Do you think the proposed regional biodiversity strategy has a role in promoting other outcomes (eg, predator control or preventing the spread of pests and pathogens)? Please explain

Yes. As outlined above predator and weed control needs to be a significant focus area to ensure biodiversity outcomes. Climate Change has huge relevance and we will see increasing pest problems to contend with.

What we want to see is an appropriately focused NPS which:

- Strong enabler for community groups to hold the line on weeds and pests. Without provision for this, there is a significant risk that sourcing funders for this work will become more challenging.
- Strengthens the links between government agencies, Iwi, Councils and community groups
- Works well with existing regulatory frameworks like the RMA, Regional and district plans and RPS provisions, regulations and acts and doesn't create additional workloads at a local level that are process rather than outcomes driven.
- Acknowledges and builds on the significant biodiversity gains already made
- Empowers the expansion of existing areas to achieve landscape scale outcomes.