



Pareora Catchment Society Incorporated

Established 2019

## **Submission to the proposed Indigenous Biodiversity National Policy Statement**

**To;**

indigenousbiodiversity@mfe.govt.nz

Submitter; the Pareora Catchment Society (Inc)

Address; 42 Bluecliffs Road, St Andrews, TIMARU 7988

### **Introduction**

The Pareora Catchment Society (Inc) (the society) represents farmers, land owners and residents of the Pareora River catchment. The principle objectives of the society are to help improve the environmental, economic, social and cultural wellbeing of the Pareora Catchment with a focus on ecologically sustainable water and land management.

### **TE KOIROA O TE KOIORA**

We support generally and in principle the initiative to improve the protection of New Zealand's indigenous biodiversity. We note however that the discussion document on a National Policy Statement has significant overlaps with the previous discussion paper on a National Policy Statement for Freshwater and includes a number of similar fundamental difficulties.

### **Implementation**

One of the most important of those difficulties is the assumption that the implementation of many of the proposals in the discussion document, particularly those involved with assessing Significant Natural Areas and identification of resident and transient indigenous species in need of additional protection, can be devolved to regional and district councils and their ratepayers.

### **Comment.**

This work will require very high levels of professional expertise. Most regional and district councils have neither that expertise or the financial ability to buy that expertise to undertake this extensive new responsibility. In fact, New Zealand currently probably does not have enough people with the expertise for each local authority to undertake this work individually. District councils in particular are already faced with, among other new obligations, the opposing requirements to meet demanding new drinking water standards and the demands of climate changer responses while keeping rate increases to a minimum. The cost of this new responsibility has yet to be calculated but, given the extent and scientific complexity of the proposals it will be a significant imposition on ratepayers. The economies of scale alone suggest this work could not be undertaken locally or even regionally.

### **Remedy**

The assessment and identification of Significant Natural Areas can only be reasonably undertaken by a central and Government funded authority or agency under strict standards adapted to each region and with proper consultation with land owners and local authorities. Those standards must ensure existing private property rights are not extinguished.

There should also be provision for compensation or purchase of privately owned land taken out of agricultural production for the restoration of former wetlands, areas of national significance or the immediate control of land owners for these purposes.



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### **Regulations**

Local authorities will also be required to promote restoration of indigenous fauna back to a minimum of 10 per cent of urban areas.

In rural areas, where there is less than 10 per cent of surviving indigenous vegetation, restoration targets must also be set. There no instructions how those targets or timeframes will be set but councils will be given the authority to impose conditions to resource consents where these areas are thought to exist. Priority areas for restoration will be wetlands, former wetlands and degraded Significant Natural Areas

### **Comment**

The restoring 10 per cent of indigenous vegetation in rural areas would be unaffordable and probably unachievable in most places. Some former wetlands have been drained and under agricultural production for more than a century. Areas in this category would amount to more than two thirds of New Zealand's current pastoral and cropping farm lands.

### **Remedy**

The qualifications, 'where practical, possible and affordable' should be added to these requirements.

### **Collaboration**

Regional Councils will be required to develop a regional biodiversity strategy in collaboration with District Councils, Maori, communities and other stakeholders.

### **Comment**

While regional council strategies and final National Policy Statement are to be developed through a 'collaborative process' our recent experience with this approach in South Canterbury has created a level of cynicism.

### **Remedy**

It will be essential to include regional and district councils and other key stakeholders genuinely in final decision-making roles rather than simply as advisors who are too easily ignored

### **Priorities**

A major fundamental concern is the suggestion that priority should always be given to indigenous species over introduced species.

### **Comment**

This approach is both unrealistic and impractical given that some introduced species (all farm animals, legally protected gamebirds, sportsfish, some big game animals, European honey bees and bumble bees as well as food crops and fruit trees) form the entire basis of the New Zealand economy and outdoor recreational heritage. New Zealand could not support its human population and be part of the international community without most of the introduced species which have now become naturalised here. Some of these species are contained and managed on farms but many (gamebirds, sportsfish and big game animals) are in self recruiting feral populations. Also, some indigenous species (southern black back gulls, kea, paradise



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shelduck, manuka, kanuka and matagouri) can be serious pests to agriculture, and to other indigenous species if not properly managed and controlled. There are of course a number of introduced species (rabbits, hares, wallabies, stoats, ferrets, weasels, rats and two species of wasp along with numerous plants and trees) which pose serious threats to many other species, introduced and indigenous, which have no value or benefit at all.

The one size fits all approach will not achieve anything useful and may ultimately do more harm than good. It will therefore be essential to distinguish between domesticated and farmed species, valued introduced species which have turned feral with self-recruiting populations and introduced predator species. The distinction between indigenous and exotic species is also important but should not be paramount. As a National Policy Statement that will set the pattern for future wildlife management decisions and influence most local authority planning instruments it will be essential to have ownership and support from all sectors of the community not just those who are passionate about indigenous species.

### **Remedy**

The value of all species should be set species by species and region by region, taking into consideration the relative benefits and negative impacts of each based on the values held by the community at large.

### **Consultation with Maori**

There is a proposed requirement in the discussion document for a high level of involvement or engagement with local Maori but there is no justification given.

### **Comment**

This appears to perpetuate the myth that Maori have some distinctive or separate association with native flora and fauna not understood or shared by non-Maori New Zealanders.

It would be fundamentally wrong and unduly provocative to give one group of native New Zealanders privileged influence over the management of natural resources over another. The principles of New Zealand law suggest that those rights are shared by all native New Zealanders without distinction and within the constraints and boundaries of law.

When it comes to affinity with natural resources the reality is that understanding of and association with native or exotic wildlife and natural surroundings has nothing whatever to do with ethnicity. This knowledge and understanding is entirely based on life experience and environment.

The native and indigenous biodiversity of New Zealand is the equal birth-right heritage of all of all New Zealanders regardless of ethnicity.

### **Remedy**

Community engagement must be on an equal basis regardless of ethnicity or any other qualification

### **Conclusion**

Any initiative to restore New Zealand's ecology to some form of imagined former state based on the narrow definition of priority importance of native and indigenous life forms will ultimately fail. The New Zealand ecology today is very different to that which Polynesians found here about 1000 years ago and vastly different to that which European settlers encountered less than 200 years ago. No other land form has undergone such a massive transformation in such a short time. Most of that transformation is irreversible. Even before the arrival of humans the New Zealand ecology was never static but was constantly responding to the dynamics of change.

It will therefore be essential to the success of this initiative that it includes all people on a non-racist and equal footing, is funded and managed centrally and not captured by an unreasonable focus on indigenous species at the cost of other life forms which a significant section of the community see as their birth-right



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heritage. Indigenous biodiversity has an important place in that heritage alongside many valued exotics but cannot and must not displace or replace them.