

09 March 2020

Draft National Policy Statement for Indigenous Biodiversity

I write to you as the manager of BRaid, a charitable trust that advocates for the protection of braided rivers.

Thank you for the opportunity to attend the workshops leading up to this draft strategy. Thank you also for the time and consideration that has gone into this draft. We have only made limited comments as we support the majority of the draft proposals and have therefore only commented on aspects that we feel need to be strongly supported or require clarification or additional aspects.

Defining ecosystems under the RMA

We would like to see more clarification on how New Zealand ecosystems are defined. Specifically, braided rivers are not waterways or wetlands. They are complex mosaic ecosystems that include but are not exclusively composed of hydrologically linked waterways, wetlands, and drylands across highly varied braidplains that change in type, morphology and function from the mountains to the sea. These braidplain ecosystems currently suffer the 'full range of adverse effects' including 'loss of ecosystem integrity, functions, and services' via in good part, by agricultural incursion. Further, braidplain ecosystems support 'highly mobile fauna' that are both taonga and classified as Nationally Critical (black-billed gull/ tarāpuka and black-stilt/ kakī). However, with respect to the current RMA, the December 2018 High Court decision, Dewhirst Land Company Ltd v Canterbury Regional Council, disregarded braidplains. This is a form of scientific (or in this case legal) reductionism that guarantees the ultimate failure of those ecosystems.

We would also like to understand what provisions have been made to adapt this Policy Statement to any new or replacement version of the RMA currently under discussion.

With respect to: **Part 3 Implementation requirements**

3.1 Overview

We strongly support the wording 'what local authorities must do..' as this has been a major point of resistance from within some local councils in terms of SNAs

3.5 Resilience to Climate Change

This lacks a provision as to the role of biodiversity in developing climate resiliency through ecosystem services such as carbon sequestration (mitigation) and coastal buffering through dune restoration (adaptation). For example, currently, dunes planted in pine forests are preternaturally prone to erosion and undercutting by presenting artificially steep profiles to high energy waves. Low profile dunes stabilised by native ecosystems bleed off energy, leading to less erosion and therefore less loss of sediment budget for beach replenishment.

We would like to see **subsection (d) added** in respect of the role of ecosystems in terms of providing climate resiliency. This is well-documented in the literature and its absence on this document is glaring.

We would also like to see:

Policy 14: to require the development of regional biodiversity strategies to include the role of biodiversity in developing resiliency to climate change in these strategies. The rationale for this is that an additional subsection with wording along those lines does not conflict with any existing policy statements or current legislation, rather, it supports them and adds a level of robustness to the necessary life-supporting role of biodiversity

3.7(f) and 3.8

We support the wording, however we would recommend more emphasis be placed on councils to outline why and how indigenous biodiversity provides free, life-supporting ecosystems services and why managing them as 'public goods' is an essential service for all ratepayers. Few people really have a clue of the role of biodiversity as 'public goods'. This has and will continue to lead to outcries and no doubt dozens of submissions on this draft strategy, claiming that SNAs are an anti-democratic trampling of private property rights. The property rights (ie, corporate and private profit margins) of a few should not be allowed to trump the rights of everyone to benefit socially, economically, and culturally, the services these public goods provide. Placing those rights and benefits front and centre should help to reduce the amount of resources spent on dealing with spurious and vocal objections including those from elected officials.

3.8 (3)

Time frames - yes! This and a lack of consequences for councils ignoring the requirements has been a huge impediment in the past.

Thank you for your time.

Yours faithfully,



Sonny Whitelaw
Manager