



Submission on Draft National Policy Statement for Indigenous Biodiversity

Thank you for the opportunity to provide these brief comments on the Draft National Policy Statement. I wish to congratulate all involved in preparing this impressive document which has the potential to contribute significantly to the reversal of the decline of our indigenous biodiversity. Aotearoa New Zealand is at a crossroads. In the words of Sir Robert Watson, Chair of The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) last year: “Nature is in dangerous and unprecedented decline and that loss of biodiversity is just as catastrophic as climate change”. Despite its shortcomings, the New Zealand Threat Classification System tells us that Aotearoa New Zealand is home to more species that are threatened with extinction than any other nation. The (IPBES) 2019 Global assessment report indicates the key drivers of decline are:

- Changes in land and sea use
- Direct exploitation of organisms
- Climate change
- Pollution
- Invasive alien species

New Zealand is no different in this respect and the draft NPS provides a policy framework to assist in addressing several of these drivers of decline on lands of all tenure.

Work on a National Policy Statement for Indigenous Biodiversity has been going on since as early as 1999 and finally it appears that a National Policy Statement may be promulgated. I have personally contributed significant time and energy to every iteration of this NPS and for the reasons outlined above, consider it is imperative this version does not stumble at the last hurdle.

The present document has arisen from a highly collaborative process and a strong consensus was reached by the parties to these discussions, as evidenced by the discussion document developed by the Collaborative Biodiversity Group and released by the Hon Nanaia Mahuta. It is based on the best available scientific evidence and framed within an overarching concept that recognises the role of tangata whenua as kaitiaki and the role of the wider community in the protection, maintenance, enhancement and restoration of indigenous biodiversity.

There is only one area where I have some reservations, namely the application of the standardised guidelines on significance assessment. It is valuable to have a standardised approach specified, especially in regions or districts that have been slow to undertake comprehensive assessments. But it would be unwise and inefficient to reassess significance in regions that have done comprehensive assessments already based on criteria extremely similar to those now recommended. Also in several regions case law from the Environment Court has already been responded to. To reassess in regions that have already done a reasonable job would be costly, alienate land-owners and lead to a result not too dissimilar to the one already obtained. If there were any doubts on the suitability of existing assessments, these could be addressed by an external independent review process at modest cost.

I commend this document to the Minister for the Environment and the Associate Ministers for the Environment and respectfully suggest it is ratified urgently, given the perilous state of New Zealand's biodiversity. Together with a new Biodiversity Strategy, this document could be the platform for a transformational change in the way we protect, enhance and restore our precious indigenous biodiversity. We surely cannot afford to wait another 20 years.

Sincerely,

A handwritten signature in blue ink that reads "Bruce Clarkson". The signature is written in a cursive style with a checkmark-like flourish at the end.

Bruce Clarkson
[12 March 2020]