

Submission on proposed National Policy Statement on Indigenous Biodiversity

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1. Thank you for the opportunity to comment on the NPSIB. I am delighted that this document has been produced and strongly support the development of a national strategy with guidelines. With approximately 4000 species in a critical state facing extinction, largely driven through loss of habitat, guidelines to give direction to authorities are urgently needed to halt the continuing loss of indigenous biodiversity. I hope this work will be actioned within this government's term of office.

About the author [REDACTED]

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Section A: Recognising te ao Māori and the principles of the Treaty of Waitangi

2. I strongly support the concept of Hutia te Rito as a way of transitioning biodiversity management to one that acknowledges Te ao Māori, mātauranga, and tikanga Māori. However, tangata whenua resources are already in high demand so managing this with appropriate resources will be essential for success. Again some areas will be well equipped to do this but other areas (such as the Hurunui in North Canterbury for example) have no marae in their district and would find this hard to achieve without considerable outside help.

Section B: Identifying important biodiversity and taonga

3. I support a comprehensive identification of all SNAs and agree that this should be led by **Central Government**. This would provide the data and thus the ability for the government to monitor and report on progress. However, SNA criteria does need to include regional variation. Some regions have less than 20% of indigenous cover left – considered by the scientists the minimum for natural regeneration. For example, Greater Christchurch and the Canterbury Plains have less than 20% and in some areas less than 10%. Most of these areas would score in the SNA hierarchy of significance quite poorly, and thus may be allowed under the RMA to be cleared for development. **Protect what remains** must be set as a higher criteria in areas such as this, rather than significance.
4. TAs do not have the resources to do this work quickly and speed is of the essence. Other approaches such as LIDAR, drones, aerial photography backed up by some field work will be required to implement this work otherwise ongoing biodiversity losses will have not been halted let alone reversed.

Section C: Managing adverse effects on biodiversity from activities

5. I support efforts to improve clarity and regulation around the impact of development on nature. Original ecosystems can never be replaced so protecting what remains must be seen as the first effort. As mentioned above some regions have less than 20% of indigenous cover left – considered by scientists the minimum for natural regeneration. For example, Greater Christchurch and the Canterbury Plains have less than 20% and in some areas less than 10%. Most of these areas would score in the SNA hierarchy of significance quite poorly, and thus may be allowed under the RMA to be cleared for development. **Protect what remains** must be set as a higher criteria in areas such as this rather than significance, swapping land or mitigation.
6. I agree that relying on SNAs alone will not halt the decline of indigenous biodiversity in Aotearoa. I therefore support the requirement that regions look to support natural regeneration outside of SNAs through encouraging the protection of what pockets remain and identifying connectivity across a landscape for mobile species.

Section D: Restoration and enhancement of biodiversity

7. I fully support proposals that promote the restoration and enhancement of degraded SNAs, areas that provide connectivity or buffering functions and wetlands or former wetlands. However, if there is scarce resources it is important to keep the focus on protecting what remains with fencing, pest control, rules and regulations. **Fencing a remnant with pest control is estimated by Queen Elizabeth Trust to cost one hundredth in time and effort than it would cost to restore the same hectares through planting and weed and pest control.** Hinewai on the Banks Peninsula is an outstanding example of restoration without planting.
8. I support the requirement to set indigenous vegetation cover targets through regional policy statements. This would help regions see how they are doing nationwide – nothing like a bit of competition and shaming! However, ensure targets make sense ecologically by covering all ecosystems based on Ecological Districts data and LENZ classifications.

Section E: Monitoring and Implementation

E.5 Integrated management of indigenous biodiversity

9. **Clarifying roles, responsibilities and leadership in biodiversity management is crucial to protecting what remains of habitat for our indigenous species.** Splitting responsibility between Regional Councils (freshwater and marine) and the Territorial Authorities (TAs) for protecting terrestrial vegetation on private land, has led to confusion as to who is responsible for setting rules and compliance. Land and water are deeply connected ecosystems and therefore needs a strategic approach with the **overview of one agency.**

10. In Canterbury, for example, there is considerable variation in how the Territorial Authorities (TAs) are fulfilling this role. As an ECan councilor I was often contacted about what looked like illegal vegetation clearance – the role of the Territorial Authorities. Some TAs have budgeted appropriate funding, demonstrated through appointing compliance officers, biodiversity officers, surveying and recording SNAs with incentives for rates relief. At the other extreme there are no qualified staff with this role, no compliance officers and a reluctance to identify and map any feature such as remnant bush or wetlands that might impinge on the landowners' rights to clear these.
11. On the whole the TAs have **too small a rating base** and thus insufficient funds to give much of a focus on biodiversity protection and thus breaches are rarely prosecuted mainly through lack of compliance officers and funding to take a landowner to court. Hence the need to fully fund this work, provide ecological expertise and the means to enforce compliance if this is going to remain as a TAs responsibility.
12. **Data management** is crucial to a successful outcome in saving biodiversity. A nationwide data base that assists with collecting and disseminating information on species, ecosystems and land usage changes. Again, this would be more practical if it was operated by a Regional Council or a National Agency
13. I support the requirement to prepare regional biodiversity strategies as a valuable non-statutory tool. **However, can I again use my knowledge of Canterbury to show this alone is sufficient – it has to have an implementation plan attached with a mechanism for reporting.** In 2008 an excellent Canterbury Biodiversity Strategy, put together through an expensive and extensive consultation process was delivered and then sat on the shelf with no funding allocated to implement it. The ECan staff that had been involved in creating the document might have ensured it was implemented but they were disbanded.

Final Comment

It is wonderful to have this document with some clear pointers as to where we need to go with protecting our critically at-risk biodiversity taonga. I urge that it is progressed as quickly as possible lest it has the fate of earlier efforts. I would like to congratulate the authors on what has been achieved in getting this consultation document to this stage and wish you all the best in processing the submissions.