



To the Ministry for the Environment

Project Crimson Trust is a charity that aims to protect and restore New Zealand's indigenous trees. We are very pleased to see the proposed **National Policy Statement for Indigenous Biodiversity** and **support its adoption** by the Government; legislature of this kind is urgently needed.

We give strong endorsement to the following measures proposed in the draft Statement:

- Recognition of the role of tangata whenua as kaitiaki of indigenous biodiversity
- Ensuring that local authorities adopt a precautionary approach towards proposed activities with effects on indigenous biodiversity
- Supporting the resilience of indigenous biodiversity to the effects of climate change
- Improving the integrated management of indigenous biodiversity within and between administrative boundaries
- Improving information on the effects of existing and proposed subdivision, use and development on indigenous biodiversity
- Identifying and protect areas of significant indigenous vegetation or significant habitat of indigenous fauna by identifying and managing them as significant natural areas
- Subdivision use and development management to ensure indigenous biodiversity is maintained
- Providing for the restoration and enhancement of specific areas and environments that are important for maintaining indigenous biodiversity
- Requiring the development of regional biodiversity strategies
- Requiring the monitoring and assessment of indigenous biodiversity
- Requiring local authorities to recognise integration in terms of mountains-to-sea and administrative boundaries (because flora and fauna do not recognise these types of boundaries)
- Requiring authorities to take a precautionary approach to activities if effects on biodiversity could be adverse, or are unknown
- Recognising the value that indigenous biodiversity brings to the well-being of various groups, particularly the importance placed on "forming partnerships between local authorities, tangata whenua, landowners, people and communities". We are very familiar with these values.
- Introducing a target of 10% of Council areas that have indigenous vegetation cover, with each regional council requiring a biodiversity strategy inclusive of a monitoring plan. Our Trees That Count marketplace and Regional Advisors (who work throughout the country) are both able to assist in achieving these goals.

We would like to see the following areas of the Statement amended:

Sadly, these protection measures for indigenous biodiversity were needed decades ago and we are now in the position of needing strong policy that supports not only the conservation but additionally the restoration of our native taonga. While recognising the value of the implementation of the 10% SNA target, we would like to see more emphasis on the need for restoration in this Statement.

We are heartened to see Significant Natural Areas designated as such. However, we would like to see these designations put in place in a shorter time frame than five years. We work with many special areas, in both urban and rural sectors, that deserve a robust and timely intervention in order to protect their unique values.

The collection of data relating to health, species, growth and removal of indigenous vegetation is fundamental to its protection. In the council areas that do collect this data, data collection and storage methods vary greatly, meaning that it is impossible to gain an accurate picture of the data on a national level. This collection and management should be administered by one central organisation: or, at least, a common data set developed to which all councils must contribute.

Likewise, the management of serious threats to indigenous biodiversity should be managed by a central organisation, not regional authorities. The increasing threat of diseases such as myrtle rust and Kauri die-back evidences the immediate need for a national approach that is backed by science and best practice.

We would also like to see the wording pertaining to climate change strengthened. Councils need to do much more than just 'promote' the resilience of indigenous biodiversity to climate change, or 'consider' climate change in making decisions. Permanent indigenous forestry is the best long term mitigation tool that Aotearoa has.

Thank you for the opportunity to make this submission.

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