



# ORANA WILDLIFE PARK



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Ministry for the Environment  
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Dear Jo

## Comments on National Policy Statement for Indigenous Biodiversity

We applaud MfE's work on the development of this policy statement. It shows the considerable depth and detail that will be necessary to halt the decline of indigenous species, flora and fauna, in New Zealand.

The strong focus on te ao Māori throughout the document is an excellent approach and achieves a qualitative and holistic methodology that is required to address threats at an ecosystem level.

As such, it is important to ensure an understanding of these principles, such as hutia te Rito, for non-Māori as addressed in Question #5. Though it is impossible to give a full understanding of hutia te rito in a document, the included whakataukī regarding harakeke fails to convey the full symbolism and meaning associated with the practice and would benefit from a fuller explanation such as "*The flax is a symbol of family unity and the maintenance of close family connections, both between generations and among relations. The family of leaves remain within their cluster, just as people remain within their particular hapu or iwi. The flax plant grows from the centre. The first shoot divides into the father and the mother, and between them a child shoots up. As this continues to happen, the original parents become grandparents and so on, and you can have many generations in the same plant. The new shoot always grows in the middle. When you cut a leaf from the flax, always cut it from the outside, because if you take the center it destroys the whole plant.*"

However, the overall tone of the document is slightly disappointing in that it seeks only to halt the decline in indigenous species. As noted with reference to Question #20 the environmental degradation in many areas of New Zealand has fallen below a sustainable level for indigenous biodiversity and does in fact require a reversal (with clearly defined outcomes) or continued decline is inevitable.

We now take the opportunity to provide feedback on the questions raised.



Orana Wildlife Trust is committed to the conservation of wildlife diversity on this planet. Our aim, along with being dedicated to the conservation of endangered species and the welfare of our animals, is to provide education, recreation and enjoyment to the public.

**Question #1:** Yes - for all the reasons stated in the introduction including confusion within existing legislation and failure of existing legislation to halt the decline.

**Question #2:** Yes - We require one consistent strategy and standard for our environment as each aspect (terrestrial, freshwater, and coastal marine) are all interconnected. We would suggest that the policy should therefore also include atmosphere.

**Question #3:** Yes - the objectives provide an opportunity to not only halt decline but pursue restoration and improvement of our ecological sustainability.

**Question #4:** Yes - te ao Māori provides a qualitative framework that reflects spiritual needs as well as ecological in addressing and managing our environment and preserving indigenous biodiversity. Through hutia te rito we can employ a holistic approach to biodiversity that will ensure sustainability by addressing the interconnection of ecosystems

**Question #5:** No - Though it is impossible to give a full understanding of hutia te rito in a document, the included whakataukī regarding harakeke fails to convey the full symbolism and meaning associated with the practice and would benefit from a fuller explanation.

**Question #6:** Yes - Associated documentation and references suggest a broad consultation process has been undertaken. The strategy itself shows a concerted effort to employ te ao Māori in a meaningful way to address species decline through consultation, collaboration and engagement with tangata whenua.

**Question #7:** The opportunities presented by working with tangata whenua are endless, however the major challenge is in finding the resource to meet the demand that this commitment will require. Current levels of consultation already strain iwi capacity with far lower standards of engagement. Dedicated points of contact (NSIP Liaisons) within iwi would greatly support our ability to meet these standards.

**Question #8:** No - Limiting customary use to indigenous flora seems tokenistic and disingenuous. While our current decline in indigenous fauna precludes the possibility at present, at least an aspirational goal should be that customary rights allow sustainable customary use of indigenous flora AND fauna.

**Question #9:** Again, dedicated points of contact (NSIP Liaisons) within iwi would greatly support our ability to meet these provisions. How these positions would be funded, trained, staffed needs to be addressed as the NSIP places a heavy burden upon iwi.

**Question #11:** Territorial Authorities.

**Question #12:** Yes - The criteria outlined take a broad approach addressing Representativeness, Diversity and Pattern, Rarity and Distinctiveness, and Ecological Context that should fully encompass key ecosystems. However the level of ecological literacy and scientific understanding necessary to implement these criteria to make an accurate determination is very high. How will this need be met? Peer reviewed? Standardised? Additionally, we have reached a level of environmental degradation where any area of indigenous vegetation or habitat of indigenous fauna has become ecologically significant. Omission of any SNA though accident or agenda would seriously undermine the sustainability of our indigenous biodiversity.

**Question #14:** District Plan and/or Regional Plan as the detail presented in the NSIP goes a long way to providing the detail and direction that would normally need to be developed at regional level – thereby negating the need for a regional policy and ensuring a national consistency.

**Question #15:** Unsure - The timeframe seems reasonable with respect to addressing indigenous biodiversity while there is something left to protect but this places a heavy burden on regional authorities. If SNAs were not to be identified within that timeframe would they therefore be outside protection?

**Question #20:** Somewhat - Loss, disruption, fragmentation and reduction address the major threats posed to ecosystems and consequently to SNAs and the hierarchy does outline a clearly defined process to eliminate or offset threats. However, the underlying philosophy appears to be focused on halting decline rather than facilitating improvement (an outcome). The environmental degradation in many areas of New Zealand has fallen below a sustainable level for indigenous biodiversity and does in fact require a reversal (with clearly defined outcomes) or continued decline is inevitable.

**Question #22:** As stated in the discussion document “This high and/or medium distinction may either weaken the ability to protect SNAs or create uncertainty about what can be done within SNAs”. If an area is significant a matter of degree is inconsequential and any new activity should be balanced against this.

**Question #24:** The definition needs to be more prominently included in the document as it could not be found. Assuming, as stated, the definition is the same as that in Kāinga Ora “Nationally significant infrastructure covers state highways, electricity transmission and generation, gas transmission, the refinery pipeline, rail network, airports and ports”. Notably it does not include water, wastewater or telecommunications infrastructure. Even these projects DO need to account for their ecological impacts given the fragility of our hold on many indigenous species.

**Question #26:** Yes - The continued decline in indigenous biodiversity shows that existing activities are not adequately constrained and therefore need to be included in the scope of these activities to ensure sustainability of surviving indigenous biodiversity.

**Question #36:** All residual adverse effects.

**Question #38:** Yes - These areas are of ecological significance or urgent imperative and need to be prioritised for later actions to have any hope of success.

**Question #40:** Somewhat – It is extremely important for the establishment of corridors and also the appreciation of greater public of the importance and ecological value of indigenous species as well as tangible markers of success. It is difficult to assess whether 10% is sufficient in all ecosystems to provide sustainable indigenous biodiversity, and impossible to gauge an unstated measure for non-urban environments.

**Question #41:** It should be promoted under the NZBS, otherwise there will be two potentially conflicting reference documents.

**Question #43:** Yes – predator control or preventing the spread of pests and pathogens are core to a regional biodiversity strategy.

**Question #46:** Yes – Given the work that is being carried out by DOC, PF2050 and in the NZBS the statement “Biodiversity Strategy (NZBS) will progress a national monitoring framework and several initiatives are already under way to develop a set of achievable national indicators; for example between councils and central government. As these

indicators are agreed over time, councils would be required to use them as part of their monitoring frameworks". This makes sense to ensure monitoring is consistent across the country.

**Question #48:** Yes – We strongly support the proposed additional information requirements within Assessments of Environmental Effects (AEEs) for activities that impact indigenous biodiversity.

**Question #49:** Implementation as soon as reasonably practicable - SNAs identified and mapped in five years - scheduled and notified in plans in six years.

**Question #58:** All of the above.

Thank you for the opportunity to provide input to this excellent draft. Again, we applaud the efforts of the writers.

Yours sincerely



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