

To the Ministry for the Environment

Submission on the proposed National Policy Statement for Indigenous Biodiversity

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From: The Tree Council

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Thank you for the opportunity to present The Tree Council's submission on the proposed National Policy Statement for Indigenous Biodiversity.

This submission is made by The Tree Council, an independent, voluntary organisation, a non-profit incorporated charitable society which has been serving the Auckland community since 1986 in the protection of trees and as advocates for the significant benefits and services that our trees and green spaces provide.

We wish to speak to our submission if that opportunity is provided.

Key points:

- Implement as soon as possible
- All types of land (public and private) are included;
- Significant Natural Areas (SNAs) are identified and protected;
- SNA policies should apply to all public conservation land;
- Potentially damaging activities should be banned from SNAs;
- Protect native species wherever they live;
- Restoration of habitats is essential to replace what we have lost;
- Climate change considerations need to be central to decision making;
- Policy statements for freshwater and marine habitats need to also be developed and implemented asap.

1. Implement as soon as possible

We are losing native species and their habitats every day. We urge the government to implement this National Policy Statement urgently and immediately and ensure that local councils do the same.

2. All types of land (public and private) are included

The same policies to protect nature need to be applied whatever the status of land upon which those native species reside. Fauna move between public and private land and they must be protected wherever they go.

3. Significant Natural Areas (SNAs) are identified and protected

Identification of local fauna and flora and their habitats is essential in order to protect them. Local people and landowners must be encouraged to work with councils to identify areas that need to be protected. Local knowledge is very important in this process and local buy in will be essential to ensure that protection is enduring.

4. SNA policies should apply to all public conservation land

It should be assumed that all public conservation land is a SNA unless it is shown not to meet the criteria for an SNA. The rules and policies applying to SNAs must apply to all public conservation land.

5. Potentially damaging activities should be banned from SNAs

New development of any kind must not damage the values of SNAs. Certain activities such as mining should be banned from all SNAs and public conservation land. Other activities may continue providing that strict rules exist to protect the habitats and wildlife that lives there. Regular monitoring of biodiversity health and compliance with these rules is essential to measure change. Resource consents need to require the protection of native species where they exist before the activity can take place. Mitigation of effects is insufficient to achieve this National Policy Statement.

6. Protect native species wherever they live

Our wildlife does not know if it lives in a national park or your backyard and some (like birds) are highly mobile, but it needs to have the same level of protection wherever it lives. Consistent rules that protect wildlife must apply across SNAs, public land and private land wherever wildlife and native species currently exist and where they may be restored.

7. Restoration of habitats is essential to replace what we have lost

Our habitats are in crisis and many have been severely damaged. We must encourage the restoration of habitats to reverse this decline and help wildlife to flourish. This will require agencies and the public working together. It will also require significant funding. Landowners should be encouraged and financially supported to restore their land to support native species. Regional Biodiversity Strategies and targets are needed to encourage habitat restoration in areas where people live.

8. Climate change considerations need to be central to decision making

Climate change is the challenge of our lifetime and the changes to weather patterns, flooding, sea level and habitats will have a major impact on our fauna and flora, which

are already under severe pressure. Therefore climate change must be required to be central to all decision making for local authorities and government, particularly environmental planning and resource consenting.

9. Policy statements for freshwater and marine habitats need to also be developed and implemented asap

This proposed National Policy Statement only applies to terrestrial habitats, fauna and flora. Our freshwater and marine environments are arguably under even more pressure. It is urgent that work to develop equivalent National Policy Statements to protect and enhance these habitats and their biodiversity is implemented.