

To: indigenusbiodiversity@mfe.govt.nz

From: [REDACTED]

14 March, 2020

Submission on NPS Indigenous Biodiversity.

Comment:

I support the NPS as indigenous biodiversity is being reduced at an exponential rate and New Zealand and we must be more active in protecting habitat.

Specific points.

With the State of the Gulf Report 2020 showing a further decline in fish stocks, biodiversity areas and an increase in sedimentation we need to be working quickly and effectively in this space.

We have to make sure that recreational outcomes and biodiversity outcomes are not competing. A recent proposal by parts of Auckland Council to put board walks in a mangrove, which is the last remaining habitat for birds is inappropriate. The NPS would give better safeguards and protection for habitat.

I would like at this stage or as a next stage, the sea to be included in a consideration of indigenous biodiversity. This is a shortcoming of the policy. Particularly for us in the Hauraki Gulf, we are very conscious of how land and sea actions influence or compliment each other. Many of our sea birds nest on land but forage at sea and are therefore subject to issues which affect the sea - overfishing, sedimentation, being caught in nets with a huge and exponential loss in biodiversity.

I have some reservations for the fact Māori land is exempt. While this is positive in terms of tinorangatiranga, it also potentially creates a loophole for indigenous land to be exploited and put under pressures that other land is not subject too. This is for example the issue for American indigenous land where casinos are built as this avoids constraints arising on other kinds of land.

In relation to the questions posed I agree that maintenance should mean no reduction. However, in practice, our biodiversity areas are affected dramatically by changes which are not monitored, e.g. a new stormwater pipes, land runoff, etc. So there needs to be a more active word which takes into account **restoration, protection and enhancement**, recognising that what is good for our environment is also good for us. Protecting the environment is not a necessary evil but essential to our life on the

planet. Replacing maintenance with enhance and protect would also put it in line with the Hauraki Gulf Marine Park Act.

I support the adoption of a precautionary approach but there also needs to be support for ongoing monitoring of projects and the ability to review and change consents to respond to negative effects. The idea that a dredging consent would simply be viewed as a continuation of an existing consent, with no regard to the context of ongoing habitat loss, or that it could be given for 35 years without review is not acceptable. Consents should be reduced in length where there is poor understanding of the adverse effects and monitoring should be undertaken by a body that is independent of the applicant but paid for by the applicant in resource consent matters.

While we need to protect ecosystems that are taonga, we also need to protect ecosystems that may be more recent, but none-the-less are an important part of our ecological landscape because they also provide important biodiversity habitat and have cultural and social value particularly when they are established green spaces in cities. Our current issues in Auckland stem from the fact European landscapes are being replaced with indigenous flora. However, it is important that the landscapes and ecosystems that are thus created are done in a gradual way which allows a continuing habitat for the fauna that live there. At the same time the indigenous landscape created needs to be a genuine ecosystem, not something where 300 year puriri in a grove are replaced with specimen individually planted nikau which are convenient to maintain but do not contribute to the creation of a genuine habitat.

We shouldn't be 'managing' fauna, we should be creating corridors and habitats where they thrive. We are concerned that the wording suggests they can be moved around at will, as opposed to belonging to a place.

I support a precautionary approach and the mapping of SNAs and also SEAs which are more localised. I do not support tradeoffs of areas of high biodiversity to facilitate mining. I do not support exclusions. If there are trade offs then these need to be considered through a process that weighs these up against other considerations. Not that they automatically confer advantage to development.

Existing issues need to be reconsidered or challenged if they are causing what turns out to be significant and identifiable adverse effects. New consents for activities that have been taking place over time at a particular location must be seen as new consents in terms of their effect on an already potentially degraded environment. So for example, granting Ports of Auckland a 15 year consent, because they have already had a consent to dredge, does not make this acceptable. It must be considered in terms of the current risks to the Hauraki Gulf. This is why the marine environment needs to be included in the policy as the current NPS does not protect us against desecration of the marine environment.

Much more engagement should occur with Te Ao Māori in terms of habitat and how to protect it and opportunities for Māori in the biodiversity space. In consenting processes if Māori or environmental groups are to challenge consent processes, they need to be resourced to do so -either by the applicant or by a fund which is resourced to support applicants.

We need at least 20% vegetation cover in towns and large trees and full ecosystems should be supported as part of that unless there is a particular reason why not. There is a risk that 10%

vegetative cover becomes small bushes and ornamental flax rather than genuine ecosystems which support a variety of life.

Areas of high biodiversity should be prioritised for protection, corridors which contribute to that, and also land to sea with a mix of ecotones.

We are nature, not a part of it or a voice for it. As such we need to not pit economic losses against biodiversity gains but realise how they are all part of the whole and strong biodiversity contributes to strong mental and physical health and contributes to a thriving economy.

Lastly, protecting ourselves from climate change needs to be central to our decision-making and thriving biodiversity and ecosystems provide key buffers and protection. Currently, it is a challenge to calculate the value of biodiversity but we need to find a way of valuing this into the future.

Thank you for the opportunity to submit.
I would like to speak in support of the submission.

Kind regards

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