

Submission on National Policy Statement on Indigenous Biodiversity (NPS IB)

To Ministry for the Environment

Name of Submitter Tararua District Council

Submission

1 Executive Summary

Tararua District Council supports the aspirational intent and purpose of the National Policy Statement on Indigenous Biodiversity NPS IB but with some adjustments, as indicated in this submission.

In summary, these adjustments are:

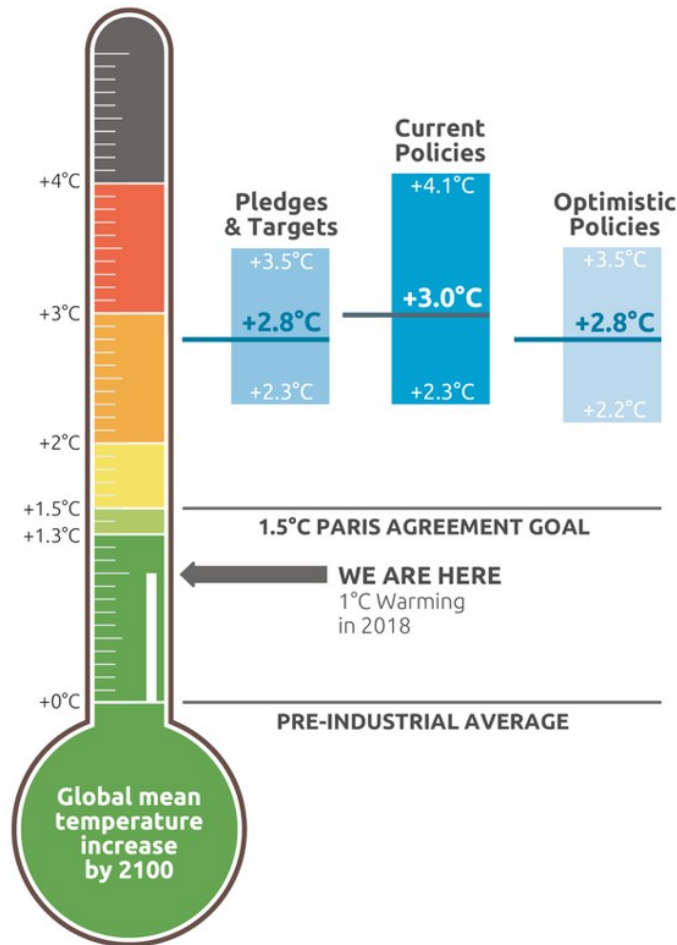
- 1 We do not support the devolvement of responsibilities from regional to territorial authorities for reasons of consistency, capability and existing experience & systems. They should remain being led by regional councils.
- 2 Resource limitations meant the transitional timeframe for compliance is likely unachievable.
- 3 We view the potential effects of climate change may supersede the Policy Objectives set out in the draft NPS IB, making them unachievable.
- 4 It is unclear why Crown responsibilities are not included in the draft National Policy Statement where they are key stakeholders, receive funding from exacerbators and are beneficiaries to the intended work.

Discussion

2 Context and Challenge

Human activity is not changing quickly enough to prevent a step change in climate. We are exceeding the levels of green-house gas emissions (offset by coolant emissions & particulates), necessary to prevent catastrophic climate change.

<https://www.unenvironment.org/resources/emissions-gap-report-2019>
<https://wedocs.unep.org/bitstream/handle/20.500.11822/30797/EGR2019.pdf?sequence=1&isAllowed=y>



CAT warming projections
Global temperature increase by 2100

December 2019 Update

An exit from the current Holocene Epoch is arguably underway.

The Draft NPS requires:

Clause 3.5 Resilience to climate change When making or changing policy statements or plans or regional biodiversity strategies, local authorities must promote the resilience of indigenous biodiversity to climate change, including at least by - a) providing for the maintenance of ecological integrity through natural adjustments of habitats and ecosystems;

This will be very challenging for the draft NPS IB policy objectives to be met in the long term:

- A recent upsetting example of the exceptional challenge is the huge loss of biodiversity in Australia where, despite all efforts, wild fires could not be prevented or extinguished.
 - o <https://www.unenvironment.org/news-and-stories/story/ten-impacts-australian-bushfires>
- [Massachusetts Institute of Technology](https://www.pnas.org/content/116/30/14813) estimate that we are on course to initiate a cascading planetary mass extinction event
 - o <https://www.pnas.org/content/116/30/14813>
 - o <http://news.mit.edu/2019/carbon-threshold-mass-extinction-0708>
- Columbia University expect humidity heat waves to exceed animal capability to survive from 2070's

o http://www.columbia.edu/~jeh1/mailings/2019/20190627_SavingEarth.pdf

- We currently have carbon dioxide concentrations that are thought to be similar to those 3 million years ago, and 23 million years ago at the time of Antarctica land ice deglaciation.
 - o Foulden Maar, Otago <http://dx.doi.org/10.1016/j.epsl.2016.09.026>
- The United Nations note that by next year, we will be in the final ten years to prevent catastrophic climate change – above 1.5 degrees Celsius.

Furthermore, biodiversity loss is but one of nine planetary boundaries currently at risk due the human activity.

These have been identified and set out by Stockholm University, Sweden:

- 1 Climate Change
- 2 Chemical Pollution
- 3 Biosphere Integrity, including biodiversity Loss
- 4 Land-Systems Change- including Deforestation
- 5 Freshwater Use
- 6 Biochemical Flows: Phosphorus & Nitrogen Cycles
- 7 Stratospheric Ozone Depletion
- 8 Atmospheric Aerosol Loading - Particulate Pollution
- 9 Ocean Acidification

<https://www.stockholmresilience.org/research/planetary-boundaries.html>

The 2019/20 Australian fires demonstrate how devastating climate related events can be on biodiversity.

As such, the expectations set out in the draft NPS IB needs to recognise that the policy objectives may not be achievable, and give further thought for tools that can manage conflicting priorities in respect of the planetary boundaries and the four well-being of all residents and visitors of and to New Zealand.

The NPS IB could make reference to this to give context to its policy objectives.

Conclusion:

Climate change effects are likely to be the greatest under-estimated impacts on biodiversity, suggesting that any targeted short-term investment in limiting loss of biodiversity may be ineffective or may be such as to have no effect.

3.1 Crown and Government

There is strong linkage of human population growth in New Zealand with ongoing and increasing pressure on ecosystems. This links with discretionary Government policy in respect of immigration targets, which in turn is affecting demand for housing stock, land, prices and council services.

Tourism, also encouraged by Government policies, is having significant effects on demand for council services and has both direct and indirect biodiversity impacts on New Zealand

The assessment of a district or region under the draft NPS IB includes Crown lands but they are generally not included as paying ratepayers. This raises the question: Is it the intent that Government be subsidised for this work by ratepayers when they are key beneficiaries?

3.2 Crown Funding

We note that Part 4: Effectiveness review provides a review structure, but there is no reference to funding in the draft NPS IB.

We suggest that a “Part 5 Funding” developed and included. This could identify how works included in Parts 1-4 are to be funded and how Government incentivisation is to be included in the required works. We note the extraordinary pressures that tourism is now placing on local authorities and how funding sources are most efficiently gathered through boarder entry fees and taxes (GST and Income Tax).

Tararua District Council supports a central role by the Department of Conservation and Regional Council oversight of our region and to meet the finalised NPS IB.

4 Horizons Regional Council

Tararua District Council supports the submission made by Horizons Regional Council.

Territorial District Councils are not well positioned for to meet the draft NPS IB with little resources, experience and qualified staff to undertake the activities set out in the draft. District councils can expect to continue to be significantly challenged by cascading risks, including (but not limited to) population growth, an expected influx of climate refugees, and the delivery of core services in a changing environment, such as sea level rise, storm damage, reducing food security, technology threats and socio-political issues.

For Tararua District, growth has been static and so less challenging than for many councils in New Zealand, though land use has changed according to the economics of a rural district. Consequently, the Horizons Regional Council are in a better position that Tararua District Council to deliver on the draft NPS IB.

Furthermore, Horizons Regional Council has databases of existing information collected on land use and has been proactive for many years to improve regional biodiversity. We have been respectful and have worked in partnership with the Horizons Regional Council for many years.

The Regional “One Plan” has set out the relationship between itself and the Region’s territorial authorities. This is set out in the Biodiversity Operational Plan 2017-18, page 6:

The One Plan In accordance with s62(1) RMA, the One Plan sets out the roles and responsibilities for the management of indigenous biodiversity. Where agreed with the territorial authorities within the Manawatu-Wanganui Region, Horizons has taken on the coordination role for the maintenance of indigenous biodiversity.

Responsibilities have been apportioned as follows:

1. Horizons must be responsible for developing objectives, policies, methods for the purposes of establishing a region-wide approach for maintaining (and enhancing) indigenous biodiversity, and rules to protect areas of significant indigenous vegetation and significant habitat of indigenous fauna and to maintain (and enhance) indigenous biodiversity.

2. Territorial authorities must be responsible for retaining schedules of notable and amenity trees in their district plans, and other measures to recognise the amenity, intrinsic and cultural values associated with indigenous biodiversity (but not for the purpose of protecting significant indigenous vegetation and significant habitat of indigenous fauna).

3. Both Horizons and the territorial authorities must, when making decisions on resource consent applications or outside the specific responsibilities of those allocated above, recognise matters described in s6(c) RMA and have particular regard to matters identified in s7(d) RMA. The objectives, policies and methods for managing indigenous biodiversity are set out in Chapter 7 of the One Plan.

The policies are implemented by two principal methods: regulatory and non- Biodiversity Operational Plan 2017-18.

Conclusion

We believe that a more consistent approach would be for regional councils, in particular to undertake the work to identify Significant Natural Areas.

Regional councils have existing systems, databases and experience to do this work. They have access to a wider rating base to allocate the necessary assessment and monitoring work.

We however, question generally whether five years will be sufficient time to complete this work to the standard expected and how the cost to do this work is to be funded.

5 Forestry

3.10 Managing Adverse Effects of Plantation Forests

As a suggestion, Plantations Forests should also include those intended for carbon farming (permanent forest) and not just that of rotational forest activity.

Carbon forestry may be a route to increasing biodiversity through the gradual loss of sterile exotic carbon forest making way for re-generation of indigenous vegetation and forest, or by the planting (including by proactive incentivisation) of diverse indigenous vegetation and forest.

6 Plan Change Notification

It is noted that the draft proposes that territorial authorities must notify any plan or plan change necessary to map areas identified in sub-clauses (1) and (2) and to give effect to sub-clauses (1), (2), (3), (4) and (5) within six years of the commencement date. Also, clause 3.8:

“Identifying significant natural areas”, (1) Every territorial authority must- a) undertake a district wide assessment in accordance with Appendix 1 to determine if an area is significant indigenous vegetation and /or significant habitat of indigenous fauna... “

We note that 3.8(6) appears to require a plan change be made - it would be helpful if the cost of any plan change process was able to be minimised in some other manner to reduce overhead costs, as this requirement indicates a higher level of bureaucratic process and cost.

It is a cumbersome process to make plan changes. Can consideration be given to simplifying this process so that changes to Significant Natural Areas can be modified by way of variation to an attached schedule with appropriate notification?

7 Conclusion

It appears that the draft NPS IB may set up local government to fail by:

- Ignoring the impacts of climate change in regard to the point where events and series of cascading events will exceed humanity’s capacity to manage or control
- Setting aspirational outcomes and expectations to all stakeholders, including Iwi and Government, that are in fact unachievable or unaffordable for the local communities and the situations inherited or being inherited
- Giving timeframes that are not achievable for the resources and skills likely to be available
- Not providing any Government resourcing to achieve the outcomes

In addition, given New Zealand’s limited resources and the carbon emission footprint all decisions have an effect on, we must choose wisely where our investment decision are made.

The best investment may be in prioritising mitigation/prevention of climate change and targeting biodiversity with adaptation pathways e.g. moving species south-wards and inland. Given the jurisdictional issues that may arise, this might best be central Government lead function, with local government a supporting partner.

This necessitates an unhappy complex series of decisions to prioritise “what to save and how”.

The draft NPS IB is aspirational but is unlikely to be achievable, setting unreasonable expectations while excluding a key stakeholder - Government itself.

8 Recommendations

1. That the Government be included in the NPS IB as a stakeholder
2. A Part 5 on Government funding be included
3. That devolvement to territorial authorities not proceed

4. More time to transition to compliance be given – say ten years rather than five years as currently drafted.
5. A further objective be included Objective 7: to recognise indigenous biodiversity in context with the nine planetary boundaries currently at risk
6. That Plan Change notification requirement be simplified
7. That Carbon/Permanent Forest be clarified for inclusion as plantation forest in the NPS IB.

9 Thank you for consideration of our submission.