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To: [submissions@mfe.govt.nz](#)  
Subject: Part eight  
Date: Saturday, 14 March 2020 4:47:11 pm  
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Question 37: What specific information, support or resources would help you implement the provisions in this section? (Section C)

Notes

Section D: Restoration and enhancement of biodiversity (pgs 68 - 76)

Overall thoughts about Section D:

Notes

Question 38: The proposed NPSIB promotes the restoration and enhancement of three priority areas: degraded SNAs; areas that provide important connectivity or buffering functions; and wetlands. (See Part 3.16 of the proposed NPSIB). Do you agree with these priorities? Why/why not?

Position

(Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

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Question 39: Do you see any challenges in wetland protection and management being driven through the Government's Action for Healthy Waterways package while wetland restoration occurs through the NPSIB? Please explain

Notes

Question 40: Part 3.17 of the proposed NPSIB requires regional councils to establish a 10 per cent target for urban indigenous vegetation cover and separate indigenous vegetation targets for non-urban areas. Do you agree with this approach? Why/why not?

Position

(Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

Question 41: Do you think regional biodiversity strategies should be required under the proposed NPSIB or promoted under the New Zealand Biodiversity Strategy? Please explain

Notes

Question 42: Do you agree with the proposed principles for regional biodiversity strategies set out in Appendix 5 of the proposed NPSIB? Why/why not?

Question 42: Do you agree with the proposed principles for regional biodiversity strategies set out in Appendix 5 of the proposed NPSIB? Why/why not?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

Question 43: Do you think the proposed regional biodiversity strategy has a role in promoting other outcomes (eg, predator control or preventing the spread of pests and pathogens)? Please explain

Notes

Question 44: Do you agree with the timeframes for initiating and completing the development of a regional biodiversity strategy? (see Part 3.18 of the proposed NPSIB) Why/why not?

Position

- (Not specified)
- Yes
- No
- Unsure
- Somewhat

From: [Ara Hession](#)  
To: [submissions@mfe.govt.nz](#)  
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Question 55: The indicative costs and benefits of the proposed NPSIB for landowners, tangata whenua, councils, stakeholders and central government are set out in the Section 32 Report and Cost Benefit Analysis. Do you think these costs and benefits are accurate? Please explain, and provide examples of costs/benefits if these proposals will affect you or your work.

Notes

Question 56: Do you think the proposed NPSIB should include a provision on the use of transferable development rights? Why/why not?

Position

- (Not specified)  
 Yes  
 No  
 Unsure

Notes

Question 57: What specific information, support or resources would help you implement the provisions in this section? (Section E)

Notes

Question 58: What support in general would you require to implement the proposed NPSIB? Please detail.

Positions - Select all that apply

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Question 58: What support in general would you require to implement the proposed NPSIB? Please detail.

Positions - Select all that apply

- Guidance material  
 Technical expertise  
 Scientific expertise  
 Financial support  
 All of the above  
 Other - please specify

Notes

Section F: Statutory frameworks (pgs 89 - 93)

Final Comments & Privacy

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Question 20: Do you agree with the use of the effects management hierarchy as proposed to address adverse effects on indigenous biodiversity instead of the outcomes-based approach recommended by the Biodiversity Collaborative Group? Why/why not?

Position

- (Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

Pragmatically the hierarchy is doable whereas the outcomes based approach overall is more desirable.

Question 21: Are there any other adverse effects that should be added to Part 1.7(4), to be considered within and outside SNAs? Please explain.

Notes

Question 22: Do you agree with the distinction between high- and medium-value SNAs as the way to ensure SNAs are protected while providing for new activities? If no, do you have an alternative suggestion? Please explain

Position

- (Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

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Question 22: Do you agree with the distinction between high- and medium-value SNAs as the way to ensure SNAs are protected while providing for new activities? If no, do you have an alternative suggestion? Please explain

Position

- (Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

Question 23: Do you agree with the new activities the proposed NPSIB provides for and the parameters within which they are provided for? (See part 3.9(2)-(4) of the proposed NPSIB) Why/why not?

Position

- (Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

Question 24: Do you agree with the proposed definition for nationally significant infrastructure? Why/why not?

Position

From: [Ava Jackson](#)  
To: [submissions@mfe.govt.nz](#)  
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Question 12: Do you consider the ecological significance criteria in Appendix 1 of the proposed NPSIB appropriate for identifying SNAs? Why/why not?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

How do we know what we don't know?

Question 13: Do you agree with the principles and approaches territorial authorities must consider when identifying and mapping SNAs? (see part 3.8(2) of the proposed NPSIB) Why/why not?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

Question 14: The NPSIB proposes SNAs are scheduled in a district plan. Which of the following council plans should include SNA schedules? Why?

Position

- (Not specified)
- Combination
- District Plan
- Regional Plan
- Regional Policy Statement

Notes

Question 15: We have proposed a timeframe of five years for the identification and mapping of SNAs and six years for scheduling SNAs in a district plan. Is this reasonable? What do you think is a reasonable timeframe and why?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

protection. An example of this is the work of the Haehaeta Naural Heritage Trust working in relative isolation identifying, gathering and propagating indigenous seeds.

Question 16: Do you agree with the proposed approach to the identification and management of taonga species and ecosystems? (see Part 3.14 of the proposed NPSIB) Why/why not?

Position

Question 16: Do you agree with the proposed approach to the identification and management of taonga species and ecosystems? (see Part 3.14 of the proposed NPSIB) Why/why not?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

Question 17: Part 3.15 of the proposed NPSIB requires regional councils and territorial authorities to work together to identify and manage highly mobile fauna outside of SNAs. Do you agree with this approach? Why/why not?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

Question 18: What specific information, support or resources would help you implement the provisions in this section? (Section B)

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Question 45: What specific information, support or resources would help you implement the provisions in this section? (Section D)

Notes

Section E: Monitoring and implementation (pgs 77 - 88)

Overall thoughts about Section E:

Notes

Question 46: Do you agree with the requirement for regional councils to develop a monitoring plan for indigenous biodiversity in its region and each of its districts, including requirements for what this monitoring plan should contain? (see Part 3.20 of the proposed NPSIB) Why/why not?

Position

- (Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

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Question 47: Part 4.1 requires the Ministry for the Environment to undertake an effectiveness review of the NPSIB. Do you agree with the requirements of this effectiveness review? Why/why not?

Position

- (Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

Question 48: Do you agree with the proposed additional information requirements within Assessments of Environmental Effects (AEES) for activities that impact on indigenous biodiversity? (see Part 3.19 of the proposed NPSIB) Why/why not?

Position

- (Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

Question 49: Which option for implementation of the proposed NPSIB do you prefer? Please explain

Position

Question 49: Which option for implementation of the proposed NPSIB do you prefer? Please explain

Position

- (Not specified)
- Implementation as soon as reasonably practicable - SNAs identified and mapped in five years - scheduled and notified in plans in six years
- Progressive implementation - SNAs identified and mapped within seven years - scheduled and notified in plans in eight years

Notes

Question 50: Do you agree with the implementation timeframes in the proposed NPSIB, including the proposed requirement to refresh SNA schedules in plans every two years? Why/why not?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

Question 51: Which of the three options to identify and map SNAs on Public Conservation Land (PCL) do you prefer? Please explain

Position



From: [Ara Hira](#)  
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**Question 29: Do you think the proposed NPSIB adequately provides for the development of Māori land? Why/why not?**

Position

(Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

**Question 30: Part 3.5 of the proposed NPSIB requires territorial authorities and regional councils to promote the resilience of indigenous biodiversity to climate change. Do you agree with this provision? Why/why not?**

Position

(Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

**Question 31: Do you think the inclusion of the precautionary approach in the proposed NPSIB is appropriate? (see Part 3.6 of the proposed NPSIB) Why/why not?**

Position

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**Question 31: Do you think the inclusion of the precautionary approach in the proposed NPSIB is appropriate? (see Part 3.6 of the proposed NPSIB) Why/why not?**

Position

(Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

**Question 32: What is your preferred option for managing geothermal ecosystems? Please explain**

Position

(Not specified)  
 Option 1  
 Option 2  
 Option 3  
 Your alternative option - please provide details

Notes

**Question 33: We consider geothermal ecosystems to include geothermally influenced habitat, thermo-tolerant fauna (including microorganisms) and associated indigenous biodiversity. Do you agree? Why/why not?**

Position

Question 33: We consider geothermal ecosystems to include geothermally influenced habitat, thermo-tolerant fauna (including microorganisms) and associated indigenous biodiversity. Do you agree? Why/why not?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

Question 34: Do you agree with the framework for biodiversity offsets set out in Appendix 3 of the proposed NPSIB? Why/why not?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

Question 35: Do you agree with the framework for biodiversity compensation set out in Appendix 4 of the proposed NPSIB? Why/why not? Include an explanation if you consider the limits on the use of biodiversity compensation as set out in the Environment Court decision: Oceana Gold (New Zealand) Limited v Otago Regional Council as a better alternative.

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Question 25: Do you agree with the proposed approach to managing significant indigenous biodiversity within plantation forests, including that the specific management responses are dealt with in the National Environmental Standards for Plantation Forestry? (see Part 3.10 of the NPSIB) Why/why not?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

Question 26: Do you agree with managing existing activities and land uses, including pastoral farming, proposed in Part 3.12 of the NPSIB? Why/why not?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

the protection. Remnant species all over Central Otago need to be documented and protected whether on public or private land if they are to survive.

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Question 27: Does the proposed NPSIB provide the appropriate level of protection for indigenous biodiversity outside SNAs, with enough flexibility to allow other community outcomes to be met? Why/why not?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

these statements. a multi generational approach is paramount to the success of this policy.

Question 28: Do you think it is appropriate to consider both biodiversity offsets and biodiversity compensation (instead of considering them sequentially) for managing adverse effects on indigenous biodiversity outside of SNAs? Why/why not?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

Question 29: Do you think the proposed NPSIB adequately provides for the development of Māori land? Why/why not?

Position

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To: [submissions@mfe.govt.nz](#)  
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**Question 49: Which option for implementation of the proposed NPSIB do you prefer? Please explain**

Position

(Not specified)

Implementation as soon as reasonably practicable - SNAs identified and mapped in five years - scheduled and notified in plans in six years

Progressive implementation - SNAs identified and mapped within seven years - scheduled and notified in plans in eight years

Notes

**Question 50: Do you agree with the implementation timeframes in the proposed NPSIB, including the proposed requirement to refresh SNA schedules in plans every two years? Why/why not?**

Position

(Not specified)

Yes

No

Somewhat

Unsure

Notes

**Question 51: Which of the three options to identify and map SNAs on Public Conservation Land (PCL) do you prefer? Please explain**

Position

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**Question 51: Which of the three options to identify and map SNAs on Public Conservation Land (PCL) do you prefer? Please explain**

Position

(Not specified)

Territorial authorities identify and map all SNAs including public conservation land

Public conservation land deemed as SNAs

No SNAs identified on public conservation land

Other - please explain

Notes

**Question 52: What do you think of the approach for identifying and mapping SNAs on other public land that is not public conservation land?**

Notes

**Question 53: Part 3.4 requires local authorities to manage indigenous biodiversity and the effects on it of subdivision, use and development, in an integrated way. Do you agree with this provision? Why/why not?**

Position

(Not specified)

Yes

No

Somewhat

Unsure

Question 53: Part 3.4 requires local authorities to manage indigenous biodiversity and the effects on it of subdivision, use and development, in an integrated way. Do you agree with this provision? Why/why not?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

Question 54: If the proposed NPSIB is implemented, then two pieces of National Direction – the New Zealand Coastal Policy Statement (NZCPS) and NPSIB – would apply in the landward-coastal environment. Part 1.6 of the proposed NPSIB states that if there is a conflict between instruments the NZCPS prevails. Do you think the proposals in the NPSIB are clear enough for regional councils and territorial authorities to adequately identify and protect SNAs in the landward coastal environment? Why/why not?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

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**Question 31: Do you think the inclusion of the precautionary approach in the proposed NPSIB is appropriate? (see Part 3.6 of the proposed NPSIB) Why/why not?**

Position

(Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

**Question 32: What is your preferred option for managing geothermal ecosystems? Please explain**

Position

(Not specified)  
 Option 1  
 Option 2  
 Option 3  
 Your alternative option - please provide details

Notes

**Question 33: We consider geothermal ecosystems to include geothermally influenced habitat, thermo-tolerant fauna (including microorganisms) and associated indigenous biodiversity. Do you agree? Why/why not?**

Position

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**Question 33: We consider geothermal ecosystems to include geothermally influenced habitat, thermo-tolerant fauna (including microorganisms) and associated indigenous biodiversity. Do you agree? Why/why not?**

Position

(Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

**Question 34: Do you agree with the framework for biodiversity offsets set out in Appendix 3 of the proposed NPSIB? Why/why not?**

Position

(Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

**Question 35: Do you agree with the framework for biodiversity compensation set out in Appendix 4 of the proposed NPSIB? Why/why not? Include an explanation if you consider the limits on the use of biodiversity compensation as set out in the Environment Court decision: Oceana Gold (New Zealand) Limited v Otago Regional Council as a better alternative.**

Question 35: Do you agree with the framework for biodiversity compensation set out in Appendix 4 of the proposed NPSIB? Why/why not? Include an explanation if you consider the limits on the use of biodiversity compensation as set out in the Environment Court decision: Oceana Gold (New Zealand) Limited v Otago Regional Council as a better alternative.

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

Question 36: What level of residual adverse effect do you think biodiversity offsets and biodiversity compensation should apply to?

Position

- (Not specified)
- More than minor residual adverse effects
- All residual adverse effects
- Other - please explain

Notes

Question 37: What specific information, support or resources would help you implement the provisions in this section? (Section C)

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To: [submissions@mfe.govt.nz](#)  
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Regards Anna Robinson

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### Overall thoughts about Section A:

Notes

Question 4: Hutia te Rito recognises that the health and well-being of nature is vital to our own health and wellbeing. This will be the underlying concept of the proposed NPSIB. Do you agree? Why/why not?

Position

- (Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

Kaitiakitanga is a system for Aotearoa in which the intrinsic linking of all living things is a valuable framework that we can benefit from.

Question 5: Does the proposed NPSIB provide enough information on Hutia te Rito and how it should be implemented? Is there anything else that should be added to reflect te ao Māori in managing indigenous biodiversity?

Position

- (Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

We need to be careful in how we define "important" local biodiversity, and ensure

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Position

- (Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

Kaitiakitanga is a system for Aotearoa in which the intrinsic linking of all living things is a valuable framework that we can benefit from.

Question 5: Does the proposed NPSIB provide enough information on Hutia te Rito and how it should be implemented? Is there anything else that should be added to reflect te ao Māori in managing indigenous biodiversity?

Position

- (Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

remnant species are not obvious or visible, for example endangered cryptic species at the Alexandra airport are in danger of being wiped out as development encroaches without proper framework for 'their' protection.

Question 6: Do you think the proposed NPSIB appropriately takes into account the principles of the Treaty of Waitangi? Why/why not?

Position

- (Not specified)  
 Yes



Question 6: Do you think the proposed NPSIB appropriately takes into account the principles of the Treaty of Waitangi? Why/why not?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

Question 7: What opportunities and challenges do you see for the way in which councils would be required to work with tangata whenua when managing indigenous biodiversity? What information and resources would support the enhanced role of tangata whenua in indigenous biodiversity management? Please explain

Notes

Ensuring funding, a framework for community consultation and collaboration is available. Developing and maintaining connections with local groups who are

Question 8: Local authorities will need to consider opportunities for tangata whenua to exercise kaitiakitanga over indigenous biodiversity, including by allowing for sustainable customary use of indigenous flora. Do you think the NPSIB appropriately provides for customary use? Please explain

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

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Regards Anna Robinson

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# Proposed National Policy Statement for Indigenous Biodiversity

Have your say  
The Government is consulting on a proposal to create a National Policy Statement for Indigenous Biodiversity. A draft National Policy Statement was developed by a stakeholder-led Biodiversity Collaborative Group. The Ministry for the Environment and the Department of Conservation have further developed this into the proposed National Policy Statement. A discussion document has been prepared which sets out the policy proposals and their relevant rationales. The discussion document is available on the Ministry for the Environment's website and we recommend you have a copy with you, as well as a copy of the proposed National Policy Statement, to refer to while answering these questions. The form below includes 63 specific questions under 8 categories. It is not mandatory to answer all the questions. There is also a general response box for each section, feel free to use this to express your thoughts on the section, or answer the more detailed questions set out below them. There is a notes box under each question for you to add supplementary comments to. Supporting documents can also be attached at the end of the form. Please fill in the form below, then click Continue to review your submission. At any time you may click Save and Exit so that you can return later.

You must provide either a company name or given name(s)

Company name	iwi, Hapū, Organisation or Company name
Given names	MAD4CO (making a difference for central otago)
Surname	
Contact person	Anna Robinson & Clair Higginson
Address	14-20 centennial ave, Alexandra
Region	Central Otago
Country	New Zealand
Phone	0226522779
Email	Envirosust@gmail.com

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Submitter type	NGO / professional body
Overall position	Support

Introduction section: Overview of the National Policy Statement for Indigenous Biodiversity (NPSIB) (pgs 10 - 22)

Overall thoughts about the introduction section and the need for an NPSIB:

Notes

Question 1: Do you agree a NPSIB is needed to strengthen requirements for protecting our native plants, animals and ecosystems under the Resource Management Act 1991 (RMA)? Why/why not?

Position

- (Not specified)  
 Yes  
 No  
 Somewhat  
 Unsure

Notes

Give direction to local authorities about identifying and maintaining indigenous biodiversity, and to develop a funding stream to ensure this work can be carried out.

Question 2: The scope of the proposed NPSIB focuses on the terrestrial environment and the restoration and enhancement of wetlands. Do you think there is a role for the NPSIB within coastal marine and freshwater environments? Why/why not?

Position

Question 2: The scope of the proposed NPSIB focuses on the terrestrial environment and the restoration and enhancement of wetlands. Do you think there is a role for the NPSIB within coastal marine and freshwater environments? Why/why not?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

Central Otago's freshwater species have evolved in isolation and demand particular identification mapping and protection from introduced freshwater species and land

Question 3: Do you agree with the objectives of the proposed NPSIB? (see Part 2.1 of the proposed NPSIB) Why/why not?

Position

- (Not specified)
- Yes
- No
- Somewhat
- Unsure

Notes

Section A: Recognising te ao Māori and the principles of the Treaty of Waitangi (pgs 23 - 30)

**From:** [Anna Robinson](#)  
**To:** [Indigenusbiodiversity](#)  
**Subject:** Part twelve, notes  
**Date:** Monday, 16 March 2020 11:12:28 am

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Anna Robinson

Q.5 We need to be careful in how we define "important" local biodiversity, and ensure we have a framework for this. In central otago we have vast and sparse areas where remnant species are not obvious or visible, for example endangered cryptic species at the Alexandra airport are in danger of being wiped out as development encroaches without proper framework for 'their' protection.

Q.7 Ensuring funding, a framework for community consultation and collaboration is available. Developing and maintaining connections with local groups who are already protecting and enhancing our local taonga species. For example local nursery, Haehaeata Natural Heritage Trust are collecting locally sourced seeds and propagating plants, many of which are threatened species, for indigenous restoration. They are collaborating with local groups including DOC to re-establish indigenous woodland.

Q10 Current insufficient resourcing has limited the ability to do this. We do not have workable systems for identifying and mapping species in private land, nor do we have any one person or organisation championing the need for this. Here in Central otago we do not have a biodiversity person at local council, and yet we have remnant species all over central Otago.

Q 15 However, we feel the time frame is quite restrictive and here in Central Otago we have vast and isolated areas of land and water that have created pockets of unique and threatened species. This makes our place A world of Difference. We appreciate the difficulty of creating comprehensive maps of these and other species. We also recognise the urgency with which these threatened species require help and protection. An example of this is the work of the Haehaeata Natural Heritage Trust working in relative isolation identifying, gathering and propagating indigenous seeds.

Q26 We agree the the SNA coupled with the offsetting part of the policy will be helpful for the protection. Remnant species all over Central Otago need to be documented and protected whether on public or private land if they are to survive.

Q27 These significant species of Central Otago are what help to make our place a 'world of difference'. At the moment if it is to preserve local species, they fly under

the radar. The full cost of regenerating these species is not understood or defined in these statements. a multi generational approach is paramount to the success of this policy.

Q 40 A timeline for the 10% would need to be established. Here in Central Otago we have very little vegetative cover currently so this would be a massive undertaking. Not impossible though.

Sent from out of the office