tena koutou

The Northland Conservation Board (NCB) members are in support of enhancing the biodiversity of our indigenous habitats throughout Aotearoa New Zealand.

We strongly recognise and encourage the need for tangata whenua philosophy of Te Ao Maori to be informed in the conservation and management of Aotearoa New Zealand’s indigenous biodiversity.

The NCB's feedback is in relation to the Proposed National Policy Statement for Indigenous Biodiversity, and is as follows:

1.3 – Purpose of National Policy Statement
The purpose of this National Policy Statement is to set out objectives and policies in relation to maintaining indigenous biodiversity and to specify what local authorities must do to achieve those objectives.

The NCB would like to raise a query regarding the use of the word 'maintaining' in the above paragraph. ‘Maintaining’ implies that the policy is aiming for biodiversity levels to remain the same. The NCB suggests that this should instead read as follows: "The purpose of this National Policy Statement is to set out objectives and policies in relation to restoring, maintaining and enhancing indigenous biodiversity..."

The NCB also suggests that the target audience for this policy should be wider than 'local authorities'; it should also be aimed at all residents of – and visitors to – Aotearoa New Zealand.

1.5 – Application
(1) This National Policy Statement applies to indigenous biodiversity throughout New Zealand, other than –
   a) indigenous biodiversity in the coastal marine area; and
   b) indigenous biodiversity in waterbodies and freshwater ecosystems (as those terms are defined in the National Policy Statement for Freshwater Management 2019).

The NCB would like to raise a query regarding the omittance of coastal marine areas...
(as seen above). 1b is covered by the National Policy Statement for Freshwater Management 2019, however 1a is not covered by any other legislation (if it is, it should be mentioned here). Coastal marine areas are of utmost importance to the indigenous biodiversity of Aotearoa. We must honour Te Ao Maori philosophy and make sure all areas of Aotearoa are included in the policy, otherwise it is not truly a policy for indigenous biodiversity, but rather one for selected areas of indigenous biodiversity.

The NCB would also like to put forward that ALL marine areas should be covered in the policy. It should include marine protected areas (Type 1, Type 2 and other marine protection tools – as listed by the Department of Conservation) as well as territory that is not currently covered in marine protected areas. The NCB suggests that the policy should cover all marine areas within Aotearoa New Zealand's Exclusive Economic Zone (200nm limit) and would like to highlight the following:

"To tatou ha i te tuatahi ko te moana, ha tuarua no tatou te whenua
Our first breath is drawn from the ocean, the second from our land" – Ngati Kuri

"Our marine diversity New Zealand's seascape is particularly rich and complex due to its:

- extension over 30° of latitude (from subtropical to subantarctic)
- position on an active plate boundary
- position in relation to major water masses and current systems.

This means New Zealand has a rich diversity of marine habitats, with over 15,000 known species. Scientists estimate that there may be as many as 65,000 marine species in New Zealand waters. Our isolation means that many of these species are not found anywhere else in the world.

Scientists estimate that as much as 80% of New Zealand's indigenous biodiversity may be found in the sea. Yet less than 1% of our marine environment has been surveyed. On average, seven new marine species are identified every fortnight." – Department of Conservation

"Less than half a percent of our marine environment is fully protected, compared to a third of our land." – Forest and Bird

The NCB strongly suggests that the National Policy Statement for Indigenous Biodiversity takes into consideration the understanding that our land does not stop at
the coastline. The NCB suggests that Aotearoa’s submerged land (and therefore the water that presides there) – up to the Exclusive Economic Zone – is fundamentally important and a crucial part of the woven tapestry of our indigenous biodiversity, and therefore the NCB cannot support a policy that does not consider such territory.

As stated on the DoC’s website (and highlighted above): as much as 80% of New Zealand’s indigenous biodiversity may be found in the sea. It seems almost pointless to progress an indigenous biodiversity policy that does not account for the territory that contains the vast majority of Aotearoa’s indigenous biodiversity.

1.7 – Fundamental concepts
The NCB would like to draw special attention to the fundamental concepts outlined in 1.7. The NCB strongly supports Hutia Te Rito as the primary fundamental concept and suggests that a communication campaign be deployed in conjunction with the National Policy Statement for Indigenous Biodiversity to help inhabitants and visitors of Aotearoa understand how to respect and tautoko this concept.

2.1 – Objectives
The NCB suggests that objective 5 should be incorporated into the wording of objective 1 (as per suggestion in 1.3 above).

The NCB suggests that objective 6 be expressly aimed at all inhabitants and visitors of Aotearoa (as well as the other groups mentioned) – as it is the responsibility of all who walk our land and/or make ripples in our water to respect and take care of it, today and for the future.

Final notes
The NCB is in full support of a policy that will offer greater protection for biodiversity on both private and public land. We feel strongly that habitats for our taonga species should be protected and enhanced whether on private or public land, and suggest that perhaps there are ways the policy can be strengthened in this respect. The NCB would like to expressly support the submission provided by the NZCA, in particular Section 9, which sets out incentive-based options for private landowners to protect and enhance the biodiversity habitats on their land.

The NCB would also like to expressly support Section 10 of the submission provided by the NZCA, which reads as follows: The NZCA is concerned that the NPS-IB does not include freshwater biodiversity. The NZCA strongly advocates for its inclusion.

The NCB also strongly advocates for the inclusion of freshwater biodiversity and echoes the NZCA’s concern that it is currently not included. The NCB has highlighted both water quality and biodiversity enhancement as key areas of concern for the Board during 2020 (and possibly beyond), and feels very strongly that these areas of concern must be given due focus in the National Policy Statement for Indigenous Biodiversity.
As it stands, the NCB feels that the National Policy Statement for Indigenous Biodiversity is lacking in both water quality and biodiversity enhancement due to the omittance of freshwater biodiversity and saltwater biodiversity. Therefore the NCB strongly advocates for the inclusion of both freshwater and saltwater biodiversity. It is the NCB’s view that this omittance means the tangata whenua philosophy of Te Ao Maori is not being honoured.

nga mihi
Lydia Draper

(on behalf of the Northland Conservation Board)