

Submission

New Zealand Biodiversity Strategy – Discussion Document

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Introduction

1. Ashburton District Council ('Council') welcomes the opportunity to submit on the New Zealand Biodiversity Strategy - Discussion Document. This submission is being made on behalf of the Council, who approved the submission on 12 September 2019 at its Finance and Business Support Committee meeting.
2. Located between the Rakaia and Rangitata Rivers respectively, and an hour's drive south of Christchurch, more than 34,500¹ residents live in the district, with the main town of Ashburton accounting for 19,280 or 56% of residents. The rest of our residents live rurally or in smaller towns or villages.
3. Ashburton district is one of New Zealand's fastest-growing districts, growing by 23% since 1996². The expansion of irrigation and dairy farming on the Canterbury Plains have been major factors in this growth.
4. As a Council, we take seriously the role we play in caring for our native biodiversity. As well as Council-led biodiversity projects such as those at Wakanui Beach and Lake Camp and Lake Clearwater, we have also offered Biodiversity Grants for community projects since 2009.
5. We lead the Ashburton District Biodiversity Working Group (a community group of representatives from a range of organisations) whose purpose is to:
 - Coordinate the implementation of the Ashburton District Biodiversity Action Plan.
 - Maintain partnerships between local and regional organisations with interest in the management of indigenous biodiversity.
 - Provide a forum for discussion and community-wide promotion of biodiversity.
6. Council supports the development and implementation of the NZ Biodiversity Strategy. The strategy is an important starting point in coordinating biodiversity efforts across New Zealand.
7. Council appreciates the opportunity to comment on the strategy and through this submission makes the following comments.

¹ Source: Statistics New Zealand Population Estimates 30 June 2018

² Source: Statistics New Zealand Census 2013

General Comments

8. Council considers that for the strategy to be successful, it needs to be supported with sufficient resourcing and commitment from central government over the long term.
9. Council suggests that the language in the strategy needs to be simplified and more concise if it is to be owned and implemented by all New Zealanders and if it is to ignite the desired 'groundswell of action and longer-term behaviour change'.
10. Greater emphasis needs to be placed on our indigenous biodiversity throughout the document. While non-indigenous biodiversity and connecting people with nature are important, the primary driver for the strategy is the state of our indigenous biodiversity. As drafted, the strategy risks being everything to everybody without addressing this fundamental issue.

Discussion questions

How well does the Discussion Document set out the problem and consider the challenges and opportunities facing nature now and in the future?

11. The discussion document describes the importance of nature and our indigenous biodiversity well. The use of charts, such as Figures 1 -3, is supported as it highlights the importance and state of our indigenous biodiversity in simple and easily understood imagery.
12. Council recommends that the concept of 'indigenous biodiversity' should be elevated in the strategy, as highlighted on page 12:

'It is proposed that the new biodiversity strategy will recognise and prioritise the special responsibility we have towards our indigenous biodiversity. It is important to consider this when making decisions on how to manage non-indigenous species and their benefits to people'.

Council supports the sentiment of these sentences and recommends this be given more prominence throughout the strategy, particularly at the beginning of the document. This would make the purpose of the strategy clearer.

Proposed strategy framework

13. Council supports the overall content of the proposed strategic framework on page 27 of the document. However, a framework should be able to stand-alone and be understood without needing additional explanation. For this to occur, we recommend the Māori values written at the bottom of the page have the English translation next to them.

Proposed vision for Aotearoa New Zealand

14. Council does not support the proposed vision for Aotearoa New Zealand. The proposed vision is too general. Rather, Council would prefer the words 'in particular our indigenous biodiversity' are inserted after 'nature'. While the intentions of the current vision are honourable, it confuses the issue and key reasons for the strategy, which is that our indigenous biodiversity is under threat.
15. Council suggests that the proposed timeframe of 50 years (2070) does not match the gravity of the situation and also has the potential to undermine the relevance and importance of the strategy. Furthermore, there is no logical explanation for this long-term timeframe, and it is not consistent with the specific timeframes set out in pages 32 and 33.

16. Council believes that 'Indigenous biodiversity' and 'In situ management' is considered to be the most important principles. The latter is important as it is more cost-effective to implement than restoration or off-site relocation.

Proposed long term outcomes

17. Council supports the proposed long-term outcomes as written, and notes the focus on indigenous biodiversity, supporting our case in point 12.

The proposed set of goals

18. Council disagrees with the wording of the proposed goals, of; 'If we have been successful...', rather we suggest that the goals are started with the more positive: 'By 2025, we will see'.
19. Council questions what 'significant' means concerning goal two (By 2025) '*All areas of significant biodiversity on land mapped and protected*'. Further detail around this goal is required for it to be useable.
20. Council recommends that the timeframe on goal one, in the 2030 goals, is moved forward and included in the list of goals to be achieved by 2025.
21. Further, Council recommends an additional goal is added to the 'By 2030' goals: 'All invasive weeds are eradicated from offshore island nature reserves and other priority biodiversity hotspots'.
22. Lastly, Council questions how 'ten' was chosen about freshwater pest species and key land-based weed species that will be reduced and controlled by 2030, and eradicated by 2050. What evidence was used to propose ten species for these goals as opposed to more or less? How will these ten species each be identified? Each district across New Zealand is unique with different biodiversity issues, and the 'top ten' will be different for each area.

The proposed plan and implementation planning

23. Council supports the proposal of a new action plan every five years to ensure that the areas of focus are continually updated and still relevant.

Regular progress reviews

24. Council supports the regular progress reviews, provided the goals being assessed are measurable and realistic.

Five system shifts

25. It is Council's view that the first system shift – 'Getting the system right' is the most important. Without this shift being successful, it will be very difficult for the other shifts to be achieved.

Getting the system right

26. Council agrees that there is currently a lack of coordination and clarity around '*who is supposed to do what*', and supports the acknowledgement that there are '*numerous pieces of legislation that are overlapping, contradictory, contested, ineffective or slow*'. Therefore, Council recommends that one of the priority actions included in this system shift is a comprehensive legislative reform programme that will address the shortcomings of the regulatory framework. There is a clear need for a consistent legislative framework that links local, regional, and national efforts to arrest New Zealand's indigenous biodiversity decline.

Kaitiakitanga

27. Council supports the proposed priority actions in this system shift.

Empowered communities

28. While Council supports the intentions of this system shift, to implement a consistent national approach to rates relief for covenanted and other protected private land will require a legislative change to the Local Government (Rating) Act 2002. It is, therefore, unrealistic that this will occur within one year.
29. Council supports the establishment of community biodiversity hubs that are funded by the central government. These could provide a 'one-stop shop' for individuals and community groups to access information, funding, advice and resources regarding biodiversity works such as planting and predator control. This recognises that there is currently a considerable amount of community interest in our indigenous biodiversity, but individual and groups are often not sure where and how to start. The hub could also assist in coordinating projects and ensuring efficient use of resources.
30. Council also supports the use of economic incentives to help and encourage landowners to manage and protect biodiversity values on their property where they have significant benefits for the wider community.

Connecting ecosystems from the mountain tops to the ocean depths

31. The proposed integration of biodiversity values into farm management plans is supported. This would assist in providing positive recognition of the voluntary efforts of landowners in protecting or restoring indigenous biodiversity within their property.

Innovating for the future

32. Council supports the proposed priority actions in this system shift.

Additional shift

33. Council believes that an additional shift is also required to ensure the effectiveness of the strategy. This shift seeks to ensure all New Zealanders understand the importance and value of our indigenous biodiversity. It recognises that public support and acceptance of the strategy is critical to its success.

Are these the components of an effective strategy?

34. Overall, Council supports the intentions of the strategy. However, questions remain how success will be delivered, including how it will be funded. Further, as previously mentioned, the definition of 'biodiversity' is too broad and needs to be specific to indigenous biodiversity to ensure the correct focus of efforts.

Council thanks the Department of Conservation for the opportunity to submit on the *New Zealand Biodiversity Strategy Discussion Document*.



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