Draft Biodiversity Strategy Submission



Q1

Our Vision is: A district where biodiversity is protected and enhanced from the mountains to the sea (ki uta ki tai) by a community that values and cares for it. Think about what our district, thriving with biodiversity, could look like in 20 years' time. What do you see?

I see a community-led project, driven by people who understand and support the intrinsic values of healthy and thriving biodiversity. The Vision statement suffers for being expressed in a "passive voice". I'd rephrase it "A district of communities that values, cares, protects and enhances biodiversity from the mountains to the sea (ki uta ki tai).

I see Council's role as being an enabler of community action, an effective regulator that ensures its District Plan upholds the NPS - IB and one of a range of funders.

Q2

Do the goals and objectives of the strategy capture what you see as the key issues facing biodiversity in the district?

No.

Please explain::

Many of the goals and objectives of the strategy capture the key issues, but some miss the mark. I understand that where multiple parties are listed under "Who", the first named is the lead agency. I argue that some leads should change in my comments below. i would also argue that the Biodiversity Strategy should clearly state that the first named organisation is the lead agency. Agree with Goals 1 & 3. Amend Goal 2 to read "Restore and interconnect to enhance indigenous biodiversity". This is the right thing to do as stewards of the lands we live on. While the community will benefit, we don't do it for the benefit of the community, but for the benefit of the environment and ecology of our place. Amend Goal 4 to read "Community groups, Runaka, landowners, private sector and public sector groups work together to conserve and enhance indigenous biodiversity". We need to do more than encourage, and in fact we are already doing more than encourage this goal. Objectives: Agree with all elements of Objectives 1.1 A to D, Objective 1.2, Objective 1.3 A & B, and Objective 1.4. The timeframe for 1.1 E. is too long when your objective is simply to "prepare for" plan changes and you expect this to take anywhere from 3-10+ years. In 3-10 years I'd expect them to be in the District Plan. I don't understand Objective 1.3 C at all. I don't understand how talking with nurseries and garden centres promotes weed prevention. Please explain. The "Who" for 1.3 D is incomplete as community groups have been regular participants in work to implement wilding tree eradication at lakes Camp & Clearwater. Objective 2.1 A, D & E - agree with all elements. Objective 2.1 B - I think this is a task best led by landowners &/or Federated Farmers, with Council providing support through its expertise in indigenous biodiversity. Objective 2.1 C - this task would be best led by landowners or a group featuring landowners in its membership such as MCCC. ADC should be a support party. Objective 2.2 A to C - agree with all elements. Objective 2.3 A to C - agree with all elements but query whether ADC is the right agency to lead on 2.3 C. None of the parties named seem ideal to me. Delete all elements of Objective 2.4. Too much work to be done restoring and enhancing biodiversity over the next 20 years to be distracted by tourism "opportunities". Objective 3.1 B & D, Objective 3.2, Objective 3.3 A, B, C & G, and Objective 3.4 - agree with all elements. Objective 3.1 A - Suggest ADBAG should lead, rather than ADC. Objective 3.1 C - ADC role to fund this work? Take care not to reinvent the wheel here. Objective 3.1 E - Add ADBAG as a specific stakeholder. Objective 3.3 D - is this a role that can be led by ADBAG?

Draft Biodiversity Strategy Submission

Objective 3.3 E - Isn't this a private sector role filled by consulting ecologists? Objective 3.3 F - delete "the" before "primary". Is this a Council role or is there another party better placed to do this? Objective 4.1 A, Objective 4.3 A & B, and Objective 4.4 - agree with all elements. Objective 4.1 B - This is normal business as usual not a strategic objective. Delete and keep doing it. Objective 4.2 - Replace "leadership" with "support" Objective 4.2 B - please clarify what is meant by "review of project code/standard" Objective 4.3 C - add "sponsors" to "Who".

Q3

What do you see as the top five priorities from the objectives mentioned in the strategy? Tick up to five objectives:

Identify and protect taoka (taonga) species and their habitat

Interconnect biodiversity sites and threatened species habitats

,

Share knowledge on indigenous biodiversity with the community

,

Encourage cooperation and collaboration among stakeholders

,

Encourage the public to participate in conservation and celebration of biodiversity

Q4

We have identified 55 actions to reach the goals in the strategy. You can read about them in the Action Plan on pages 28 - 35 of the draft strategy. Is there any specific action or anything else Council should be doing to support biodiversity in the district? Note – Goals and objectives related to water quality for rivers, lakes and wetlands are regulated via the Canterbury Land and Water Regional Plan and therefore not part of this strategy.

I have looked at the submissions posted to your website. In particular I strongly endorse the submission of the QEII Covenant Trust and commend you to take on board their practical experience and sense of urgency.

I concur with the following points made by other submitters:

- 1. No effort has been made to define "ecological values". Council has been party to the Canterbury Biodiversity Strategy since 2008, and has employed staff working in biodiversity for several years. A failure to define the values is a curious omission.
- 2. I concur with the many who urged more effective action on pest control, whether it be fauna or flora. In domestic environments, the need for greater control of domestic cats is raised by various submitters and at least one mentions cat registration. Replicating the Dog Control Act for cats is a step too far for me at this time, but protection of native birds and the return of birdsong to urban neighbourhoods is a recurring theme in submissions. Some more educative activity around steps cat owners can take to hinder the hunting activities of their moggies would be a good thing.
- 3. I agree with submitters including Save the Rivers & Murray Hawkes that the disclaimer about water-related biodiversity is something of an excuse for a glaring gap in an otherwise very good document. The existence of the Canterbury LWRP has not stopped Council developing and adopting other documents that highlight the ecological values of waterways including the Surface Water Strategy and the Water Races Bylaw. Nor does the existence of other regulation prevent Council from taking or enabling non-regulatory measures.
- 4. Like Allison Early, I favour a document that is attainable and achievable and think that this is a strength of the document.
- 5. I read with interest the plans of Methven Lions to promote protection of birds and support them in that endeavour. I note their comments about the timeframes for actions 1.3 B and 1.3 D and as much as I applaud their sense of urgency, I suspect these activities (wilding tree removal and pest control) will require ongoing investment.
- 6. My comment on the submission of Anonymous 5 is that ECan is not in fact the only organisation with responsibilities for the protection of biodiversity, as the draft Strategy makes very clear.
- 7. Jessica Falconi sees ecotourism as a potential source of funding for future action on biodiversity, and she may well prove correct. The Oamaru Blue Penguin Colony is an excellent example of how ecotourism ventures can generate a return and invest back in the wellbeing of the wildlife itself. I remain of the view that, for the 20-year life of this strategy, energy should be focused on protection and enhancement of biodiversity rather than tourism.
- 8. Much as I respect the views of all submitters and their rights to express them and be heard with an open mind, I do not share the views of Murray Hawkes that the document is mere "greenwashing" and nor do I share Sharon MacKenzie's despair at the ability of local and central government to do anything competently.

Draft Biodiversity Strategy Submission

Q5

Do you have any other comments or feedback?

Yes. I strongly believe that Council needs to pay close attention to the sustainability of its services and to maximise the value it can derive from ratepayer funds. There are a number of examples where Council enables other organisations to deliver services and maintain assets - Reserve Boards & Hall Committees are two examples. There is already substantial community involvement in the delivery of projects that support and enhance biodiversity and Council would be wise to support more community leadership than to assume that it will lead by default. This comment comes from a belief that, wherever feasible, community leadership will be more enduring and more cost-effective than Government - be it local or central.

Like many other submitters including Ed Eason and Allison Early, I would also add my thanks and congratulations to those involved in preparing the Draft Biodiversity Strategy to this point. There is much in the document that deserves praise and it is a good basis for public feedback on improvements.

When asked to choose five objectives, my choices were guided by the observation that some of the objectives seemed repetitive or a sub-set of others. As a result I tended to favour objectives which were broader and more inclusive. For example, "Share knowledge on indigenous biodiversity" must include Manawhenua knowledge on that topic.

Q6

Your contact details

Name Richard Mabon

Q7

Do you wish to speak in support of your submission at the hearing?

No - I do not wish to speak in support of my submission and ask that my written submission be fully considered.