

24 November 2023

QEII comments on draft Ashburton District Biodiversity Strategy

We welcome the opportunity to comment on Ashburton District’s draft biodiversity strategy.

We congratulate council staff and partners on the development of a draft biodiversity strategy that is well-presented, clear and starts a conversation for the district around the importance of biodiversity. As an organisation that plays a key role in facilitating private land conservation in the district, we feel positive about the direction and vision that the draft strategy presents.

The lifespan of the draft strategy is expected to be twenty years. The next two decades will be critical for conservation in the district, and action to protect and restore remnant indigenous biodiversity is urgent. The district (led by the council and mana whenua) has a real opportunity to pioneer the protection and reversal of biodiversity loss in a district that has experienced some of the greatest loss of native biodiversity of any ecological district in the country. This requires a bold vision, clear actions and targets for implementation, resourcing, and accountability. The biodiversity strategy should provide a framework for this important work over the two decades to come, and we think the draft strategy is a good start.

Our submission comments on the following.

1. QEII’s work in Ashburton District
2. Comments on the draft biodiversity strategy
 - State of biodiversity in Ashburton District
 - Strategic Vision
 - Comments on the “Action Plan”
 - Reporting and Review
 - Resources and Funding

1. QEII’s work in Ashburton District

In partnership with private landowners, QEII plays an important role in biodiversity conservation in the Ashburton District. We work alongside private landowners to place covenants on their land to protect areas with open space values, in perpetuity. Our Regional Representative for the area Alice Shanks facilitates our work ‘on the ground’ through trusted relationships with landowners.

There are 22 open space covenants (OSCs) in the district, protecting approximately 132 hectares of lowland primary and modified secondary native forest, tussock and shrublands, wetlands etc. Ashburton district has sustained massive biodiversity loss over generations and little remnant indigenous biodiversity remains. This is particularly the case on the Ashburton Plains, where crumbs of remnant biodiversity are highly fragmented and often threatened, and subject to ongoing loss from vegetation clearance, intensification of adjacent land-use etc. Many of these remnants on the lowlands are found on private land, so working with and supporting private landowners in this work is critical. Action on private land needs to be a central component of the biodiversity strategy.

We also have three agreements with the Ashburton District Council for protection of high-value vegetation in roadside areas. QEII biennially monitors and reports on the vegetation in the designated roadside, and the Council has committed to maintaining the area's natural values, primarily through weed control and sensitive management.

There are more areas of remnant indigenous biodiversity on private land that need protection, and QEII also has an important role as the perpetual trustees of covenants to support landowners with ongoing stewardship. We would be grateful for any opportunities to collaborate with the council and others in the district to continue supporting landowners with this important work.

2. Comments on draft Biodiversity Strategy

Overall, we support the draft biodiversity strategy and feel positive about the direction it is taking. However, we would like to see more urgency conveyed in the strategy, and clearer targets and measures of progress/success.

State of biodiversity in Ashburton District

The biodiversity strategy should be a call to action – we would like to see more emphasis put on the serious state of biodiversity in the district, and the need to take urgent action. While the strategy does outline the threats facing biodiversity in the district, we don't think it conveys the urgency with which we need to approach this work.

Page 12-15 presents a good summary of indigenous biodiversity in the district, but we would like to see some more specific information included e.g., what kind of naturally uncommon ecosystems are represented in the district, what proportion of land is already protected, how many indigenous species are known to be found in the district, what are their threat statuses etc. We would also like to see the inclusion of a map showing Threatened Environment Classification across the Ashburton District as this would be an impactful way to show the story of loss of indigenous vegetation cover and lack of biodiversity protection, particularly on the Ashburton Plains.

Strategic vision – “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” – protecting what is left, first.

QEII strongly supports the proposed vision for the strategy. This vision aligns with the Biodiversity Strategy for the Canterbury Region, which has the guiding priority principle “*focus first on protecting and maintaining what remains, and then on restoring what has been lost*”, and was signed by the Ashburton District Council in 2008. It also aligns with the key objective of the National Policy Statement for Indigenous Biodiversity (NPSIB) of maintenance and no further loss of indigenous biodiversity.

The limited indigenous biodiversity that remains in the district, especially that on the Ashburton Plains must not be lost and must be prioritised for protection and enhancement. Goal 1 of the draft strategy suggests that this is a priority “*Goal 1: Protect and Maintain: The remaining indigenous biodiversity in the Ashburton District is protected and maintained.*” QEII strongly supports this goal, but we think it could be strengthened with the inclusion of “*no further loss of indigenous biodiversity*” to recognise the significance of the remaining biodiversity in the district and to prevent wholesale loss of biodiversity on the Plains.

Comments on “The Action Plan”

We support the objectives and actions identified in the action plan and make a few comments and suggestions below, mainly related to Goal 1 as this is QEII’s expertise.

Goal 1 – Protect and Maintain: *The remaining indigenous biodiversity in the Ashburton District is protected and maintained, and there is no further loss of indigenous biodiversity” (QEII suggested addition).*

- A number of actions under goal 1 refer to the review of the Ashburton District Plan. This review will be critical to ensure that identified SNAs are protected by robust planning rules (including more stringent indigenous vegetation clearance rules) to prevent further loss of indigenous biodiversity values. We note that identification and protection of SNAs is just the first step, and that landowners, community groups etc who are stewards of these areas need to be supported (education, resources etc) to take action to maintain and enhance these areas. It’s only through protection and active stewardship that real reversal of Ashburton’s biodiversity crisis will be achieved.
- We’re pleased to see *Action 1.1.B “Encourage covenants and other forms of land protection in private properties and Council reserves with ecological values”* and look forward to working with council and private landowners to support the protection and stewardship of indigenous biodiversity on private land in the district. Council can “encourage” covenants through outreach and education with landowners and providing funding support for covenant establishment and ongoing covenant stewardship.
- Strengthen and prioritise *Action 1.4B – “Review ADC vegetation clearance rule for rural zones and implement changes to provide better protection for indigenous biodiversity.”*
- In line with a review of the district plan, we’d like to see an action around increased education and enforcement of district plan rules that protect indigenous biodiversity.
- *Objective 1.3. “Further loss of threatened indigenous species is prevented by the control, or eradication, of pest species (fauna and flora)”* – the council needs to take a strong stance on the impact of wilding species such as wilding conifers, sycamores, plums and cherries – these continue to invade natural environments like braided rivers, montane tussocklands, shrublands and suppress the natural regeneration of many indigenous species.
- *Monitoring* – there is no mention of this in the strategy document, and we think that ecological monitoring should be a key component of goal 1 (and 2). If we don’t know what direction things are going in, we can’t make informed decisions about what actions we should be investing in. We recognise that in implementing the NPSIB, the regional council will be required to develop a monitoring plan for SNAs and some of the other objectives of the NPS. At the very least, the regional council monitoring programme needs to feed into the monitoring and review of the Ashburton biodiversity strategy.

Goal 2: *“The indigenous biodiversity in the Ashburton District is restored, enhanced and ecologically interconnected for the benefit of the community”.*

- QEII strongly supports this goal though we note that with finite resources, the priority should remain protection of remnant biodiversity first and foremost, as highlighted in the Canterbury Biodiversity Strategy. Recreating indigenous biodiversity “from scratch” is never as ecologically representative and resilient as regenerated areas from remnant biodiversity and is also significantly more resource intensive.
- We particularly support the objectives and actions around focusing restoration efforts on ecological buffers and corridors, connecting areas of existing indigenous biodiversity.

- We strongly support 2.3. A-B to investigate and provide incentives to landowners with indigenous vegetation on their farmlands. In QEII's experience incentives can be an effective way of engaging landowners and making protection and enhancement efforts more affordable. Mechanisms like incentives can help move landowners from simply protecting areas as required through the district plan, towards being active stewards of biodiversity on their land (as referenced above).
- We encourage ADC to use the Reserves Act to create Scientific Reserves to provide the highest level of protection to remaining areas of national significant biodiversity, for example, sites of significance to braided river birds.
- For restoration work in the district, we think the council should seek advice from rūnaka and scientists (e.g., Manaaki Whenua) on eco-sourcing plants in a district with significantly depleted biodiversity and provide this advice to nurseries. We think there's a potential role here for the ADC botanical gardens to develop and conserve local genetics of indigenous flora species.

Reporting and review

We strongly support annual reporting on the Action Plan's implementation, and a full review every three years. In QEII's experience, it's easy for work to lose momentum once strategies and action-plans reach implementation stage. Annual review is critical to ensure that the plan is being implemented and progress is being made. As mentioned above, it's important that council has the right information and data to assess progress and effectiveness of actions that are being taken, e.g., ecological monitoring.

Resources and funding

The work identified in the draft strategy will require significant resource.

We would like to see the council increase the funding available to landowners for protection and enhancement projects to the extent that it will make a material difference. While the \$15,000 per annum Biodiversity Grant is a great start, it's significantly below what is required to facilitate landowners, community groups etc to take impactful action. We would support a funding boost for the Biodiversity Grant through the next annual and/or long-term plan process.

Increasing the community grant pool for biodiversity would undoubtedly accelerate protection and enhancement of indigenous biodiversity on private land in the district, supporting landowners and community groups with things like fencing, pest plant and animal control, and appropriate targeted revegetation.