



## **Submission on Te Koiroa o Te Koiora: discussion document on proposals for a biodiversity strategy for Aotearoa New Zealand**

Sent via email to [nzbs@doc.govt.nz](mailto:nzbs@doc.govt.nz) on 3 September 2019

### **Introduction**

1. The Hurunui District Council thanks the Department of Conservation for the opportunity to comment on Te Koiroa o Te Koiora: discussion document on proposals for a biodiversity strategy for Aotearoa New Zealand. The Hurunui District Council considered this document at a workshop on 15 August 2019.
2. The Hurunui district is located in North Canterbury. We have approximately 12,850 residents and cover an area of 8,646 km<sup>2</sup> spanning from the east coast across to the Main Divide. The Hurunui district is predominantly rural land interspaced with small service towns. Our economy is reliant on primary production and tourism.
3. There is agreement in our district from both Council and landowners that biodiversity is important and needs to be managed to arrest further decline. However, the 'how' has been the subject of much discussion, particularly around the mapping of significant natural areas on private land and the use of regulatory versus voluntary methods. As such, when our District Plan was reviewed (made operative 21 June 2018) a different approach was taken to not map significant natural areas, but consider significance on a case-by-case basis through the resource consent process, with incentive to prepare Biodiversity Management Plans to provide a more inclusive approach to biodiversity and business/land management.

### **Why Aotearoa New Zealand needs a strategy for nature**

4. The Council is generally supportive of the ambition and direction of the strategy.
5. It is understood the strategy is trying to take a holistic view of nature and biodiversity. Our Council recognises the value of both 'indigenous' and 'exotic' biodiversity to the functioning of the environment, human life and the economy.
6. However, there was debate around the use of the term 'biodiversity'. Some Councillors read different meaning into this term, which may indicate the intent of the strategy is not explicitly clear. Some Councillors considered some instances where biodiversity is used it seems ambiguous about whether all biodiversity is actually meant, or if the intent is actually indigenous biodiversity only.
7. There was also discussion around how this strategy aligns with other strategies such as the Predator Free 2050 strategy. It is considered highly important this strategy clearly aligns with existing strategies.
8. From previous experience in our district the Council would like to highlight the need to tread carefully to ensure obligations placed on landowners under this strategy do not alienate existing and future grassroots initiatives.
9. From the Council's perspective a key outcome of the strategy should be the enablement and coordination of grass roots initiatives at the local level through the provision of pathways,

resources, knowledge and connections to make things as easy as possible for individuals and groups to act.

### **Goals – how will we track our progress?**

10. The direction and ambition of the proposed goals is generally supported unless stated otherwise below.
11. The 2025 goals include a stocktake of significant biodiversity (bullet point #2). The Council consider it would also be useful to establish a baseline of what action (across all levels) is currently being undertaken. The combination of this knowledge would provide a benchmark of where we are starting from, and from which progress and achievement can be tracked. It is considered important to have a clear starting point to ensure success is measurable and accountable.
12. Comment on specific goals is provided below.

### **2025 goals**

#### *No further decline in the number and extent of coastal and freshwater wetlands*

13. Low lying coastal areas around New Zealand are at risk of inundation due to the predicted rise in sea levels as a consequence of climate change. This could see a natural decline in the number and extent of coastal and freshwater wetlands.
14. In addition there is evidence sea level rise is causing higher water tables further inland and creating new wetlands.
15. This goal is not supported in its current form.

#### *All areas of significant biodiversity on land mapped and protected*

16. What is intended by 'significant biodiversity'? Given the definition of biodiversity, does this mean only significant 'indigenous' biodiversity, or significant biodiversity regardless of whether it is indigenous or not?
17. What does 'protected' mean? Fenced and forgotten, or protected by active management e.g. pest control.
18. This goal is not supported in its current form.

#### *All predators and non-indigenous browsers eradicated from all offshore island nature reserves and other priority biodiversity hotspots*

19. 'Eradicated' is considered a very strong word. Is eradication always necessary to achieve the desired outcome? Depending on the definition of priority biodiversity hotspots, eradication may not be realistic either through cost or environmental/geographical constraints. Management of predators may be appropriate in some locations.

### **2030 goals**

#### *Achieving biodiversity outcomes is a part of standard farming practice*

20. Suggest this should be amended to "standard business practice". The Council does not support the targeting of farming. All business, not just farming, may have an impact on biodiversity.
21. This goal is not supported in its current form.

## **2050 goals**

*Every business is helping to restore nature*

22. Suggest this should be amended to “every person”.
23. The beginning of the strategy and other language used throughout the strategy suggest biodiversity is the responsibility of all New Zealanders as a collective, not just businesses.
24. This goal is not supported in its current form.

## **Five system shifts to support change**

25. General agreement and support for the shift themes and priority actions. Specific comments are provided below.

### ***Shift 3: Communities are empowered to take action***

*Review current tools for providing best practice information and advice [...] to determine whether a new online portal should be established and maintained*

26. Consider “community initiatives for best practice” should be added to the topic list.
27. This would provide tried and true learnings that existing community groups have discovered on their journey that could help other community groups who encounter the same hurdles or difficulties.

### ***Shift 4: Connecting ecosystems from the mountain tops to the ocean depths***

*Integrate biodiversity management into farm management, for example through inclusion in integrated farm plans*

28. Again, the Council considers the focus here on farming is too narrow. Following the inclusive message of this strategy, biodiversity management should be integrated into all land uses, not just farming. There are other land uses, e.g. urban development and primary production industries, where it would be useful to integrate biodiversity management.
29. This priority action is not supported in its current form.

*Ensure that the One Billion Trees programme delivers benefits for biodiversity*

30. Suggest the priority action regarding the One Billion Trees programme should ensure it is not detrimental to indigenous biodiversity or grassland farming. The Council see there being a risk the One Billion Trees programme could have perverse outcomes if a focus on replanting indigenous biodiversity is not made. The One Billion Trees programmes seems to have a focus on planting pine trees, particularly *pinus radiata*. In many cases this is replacing one monoculture (grass) with another monoculture, which does not necessarily encourage better outcomes for biodiversity and nature.

### ***Shift 5: Innovating for the future***

*Establish a data commons for biodiversity information*

31. Consider establishment of a data commons for biodiversity information should have an immediate priority, rather than a medium term priority. This information will form an important benchmark from which progress can be tracked.

32. This shift has a heavy focus on funded science. Suggest consideration of an additional priority to run and support an 'innovation challenge' to recognise the role of 'backyard innovation' in supporting biodiversity outcomes.

Yours sincerely,



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