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Report to the Policy and Finance Committee
from John Holmes, Section Leader, Policy Advice

Submission on the Draft New Zealand Biodiversity Strategy

1. Purpose

To seek approval from the Committee for a submission on the Draft New Zealand Biodiversity Strategy.

2. Background

The Draft New Zealand Biodiversity Strategy was launched by the Prime Minister on 20 January 1999. The Ministry for the Environment and the Department of Conservation have been primarily responsible for the preparation of the Draft Strategy. Submissions are due by 16 April.

As part of a series of regional presentations on the Strategy, the Regional Council hosted a workshop on 8 February. A second workshop was held in the Wairarapa in early March.

At both workshops, Councillors expressed a high level of interest in the Strategy. Accordingly, and because the Strategy potentially has implications for many aspects of the Regional Council's functions, a draft submission has been prepared for consideration by this Committee. The submission has been written in consultation with officers from those departments most likely to be affected by matters raised in the Strategy.

3. Summary of the submission

The Draft Strategy presents an analysis of the decline of New Zealand's biodiversity and options aimed at halting the country's "most pervasive environmental issue". The document is appropriately titled *Our Chance to Turn the Tide*.

The attached submission generally supports the Strategy in its pursuit of halting this loss. However, it is one thing for the loss to be halted; it is quite another to “turn the tide” and begin to reinstate our ecosystems and species. In brief, our assessment of the draft strategy is that it does not aim high enough. The goals proposed and the means of achieving them may “bottom out” the line of species decline, but more is needed, by many players, if the tide is indeed to be turned.

In summary, the submission makes the following points:

(1) **Choice of Goal Level**

The central question of the Strategy is at what Goal Level should it aim. The Strategy settles on Goal Level 3 which, in essence, aims to halt the decline in species and areas of indigenous biodiversity through maintaining a “**comprehensive and representative range**” of remaining natural habitats and sustaining those **features** that support indigenous biodiversity in a **range** of modified ecosystems.

The message of Goal Level 3 is that a modest increase in action over the next 20 years will keep us where we are. While being a pragmatic target, it fails to inspire a sense of urgency. If the analysis contained in the Strategy is to be believed, and biodiversity loss is the most pervasive environmental issue, then a response of a similar scale and urgency is needed.

For the reasons given in the submission, a more appropriate and inspiring goal is needed. Goal Level 2 is more inspiring and represents a very similar level of outcome to that sought by the Council in its Regional Policy Statement (RPS) (Ecosystems Chapter Objectives). However, like all of the Goal Levels, Level 2 focuses only on the “places” of biodiversity (key habitats, ecosystems, and features) and not on the “processes” of ecological systems that are necessary to achieve a healthy level of biodiversity.

To give effect to this idea, Goal Level 2 could be reworded to read:

Maintain and restore all remaining natural habitats and ecosystems to a healthy functioning state and sustain those features and ecological processes that support indigenous biodiversity in all ecosystems...

While such a goal will no doubt cost more than Goal Level 3, it is the only logical way to advance the cause of biodiversity because it encompasses both the “processes” of ecosystem functioning and the “places” of the special and rare indigenous ecosystems that we still have.

(2) **Resources**

The strategy targets private land as a key area of effort, and thus the use of “incentives” and providing “increased assistance” for landowners carries a clear and simple financial cost for local (and central) government. Other actions too (information collection and dissemination, increased pest management and habitat management etc.) will also mean that additional

resources will be required across a range of local authorities with variable abilities to meet all such costs.

(3) **Mandate**

Currently, neither territorial authorities nor regional councils operate under statutes which have, as their explicit purpose, the promotion of biodiversity. While regional councils, in particular, do a great deal to manage the environment sustainably, and to counteract the effects of plant and animal pests on natural resources, their mandate is not unequivocally focused on species protection or habitat management.

Clarification of this statutory role for local authorities, and of the relationships between parties with an interest in or responsibility for biodiversity protection, would be helpful.

(4) **Local authority actions**

The actions which the strategy seeks from local authorities are expressed in a very general manner. This is probably all we could expect from the document at this stage and undoubtedly this will be clarified as a result of the submissions process. The actions proposed in the Strategy are designed to implement Goal Level 3. These could change if a higher goal was chosen.

(5) **Regional Plans**

The use of regional and district plans is questionable as a means of achieving a prompt or effective reduction in biodiversity loss. The first generation of plans is probably too far advanced and, because of the legislative limitations regarding mandate, is not readily able to incorporate the comprehensive range of biodiversity objectives and outcomes suggested in the strategy. The next opportunity to incorporate a biodiversity focus through resource management plans is perhaps a decade away.

(6) **A National Policy Statement**

It is also doubtful whether a National Policy Statement on Biodiversity will be a sufficiently responsive means of reducing biodiversity loss. The Statement must go through necessary (but lengthy) statutory processes. Moreover, while providing a sense of direction, the Statement might not necessarily produce the “certainty of outcome” anticipated in the strategy.

(7) **The Coastal Marine Area**

The coast is recognised in the Strategy as an area of potentially very high biodiversity, but little is known about this. Organisational roles and mandates for managing the coastal environment and its biodiversity also need to be clarified. The resources needed for reaching a better understanding of marine biodiversity, and thence for more effective management, are likely to be high.

4. **Where to from here?**

The focus of the Biodiversity Strategy on the value of biodiversity and in particular, the importance of maintaining environmental systems in a healthy, functioning state reaffirms the significance of the work of the Regional Council for the Region.

Many of the outcomes sought and the actions suggested by the Strategy are consistent with what is promoted in the Regional Policy Statement, especially in its Ecosystems chapter. Additional actions that the Council could take are broadly identified in the Strategy, but it is not possible to put a figure on the potential costs at this stage because of the generalised nature of the proposals and uncertainty as to from where, ultimately, funding might be derived (i.e. regionally or through a government commitment of some kind).

Staff from across the Council have been working on the implications of the Ecosystems Chapter of the RPS for some time and will be presenting Councillors with a range of options for implementing its methods and policies in late May. This workshop will consider fully the biodiversity issues facing the Region as the promotion and protection of regional biodiversity have been a part of the RPS since its inception. We will also provide suggestions on how the Draft Strategy could be responded too in a concerted manner through Council actions.

5. **Recommendation**

That the Committee recommend to Council that it:

- (1) *Approve the submission on the Draft New Zealand Biodiversity Strategy, subject to any amendments made at the meeting.*
- (2) *Authorise the Chairman, Environment Committee and the Divisional Manager, Environment, to approve any minor editorial changes.*

Report prepared by:

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Attachment: 1