

24 July 2017



Customer Services  
P. 03 353 9007 or 0800 324 636

PO Box 345  
Christchurch 8140

P. 03 365 3828  
F. 03 365 3194  
E. [ecinfo@ecan.govt.nz](mailto:ecinfo@ecan.govt.nz)

[www.ecan.govt.nz](http://www.ecan.govt.nz)

Threatened Species  
Department of Conservation  
PO Box 10420  
Wellington 6143

**Email: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)**

Dear Sir or Madam,

**Environment Canterbury submission: Threatened Species Strategy**

Thank you for the opportunity to provide comment on the Threatened Species Strategy. Environment Canterbury's submission on the Threatened Species Strategy is attached.

For all enquiries please contact:

Cecilia Ellis  
Senior Strategy Advisor – Policy  
Phone: 027 404 4817  
Email: [cecilia.ellis@ecan.govt.nz](mailto:cecilia.ellis@ecan.govt.nz)

Yours sincerely

A handwritten signature in black ink that reads "Steve Lowndes".

Steve Lowndes  
**Acting Chair**

**Encl:** *Environment Canterbury Submission to the Department of Conservation on the Threatened Species Strategy*



# **Environment Canterbury submission on DOC Threatened Species Strategy**

21 July 2017

## **Introduction**

1. The following contribution is offered on the basis of Environment Canterbury's roles and responsibilities under the Resource Management Act 1991 (RMA), the Local Government Act 2002 (LGA), and the Biosecurity Act 1993. Regional council's role includes the establishment, implementation, and review of objectives, policies and methods for maintaining indigenous biological diversity and maintenance of indigenous biological diversity.
2. The Canterbury region covers a diverse range of ecosystems and landscapes which are home to a number of unique and rare fauna. The Canterbury mudfish/kōwaro is endemic to the region. Acutely threatened birds such as wrybill/ngutu-pare, black-fronted tern/tara and black stilt/kakī have important habitat areas within the region. At least seven threatened lizard species are found within the region. The region's indigenous species include a number of fish, birds, plants and marine mammals specifically recognised by the Crown in the Ngāi Tahu Claims Settlement Act 1998 as taonga species.
3. Effective strategies and initiatives are key in the context of biodiversity decline, multiple changing threats to biodiversity and the complex nature of biodiversity roles and responsibilities. Environment Canterbury is supportive of the intention of the strategy, however feels it lacks clear strategic direction and would benefit from tangible targets and goals underpinned by clear actions, accountability and funding to support the work.

## **Vision**

4. The vision sets out what the strategy is and other existing initiatives rather than envisaging the desirable future state for threatened species. The vision should be more future focused, concise and engaging on what the vision is for threatened species. An option could be similar to the wording used in the foreword, the ambition to 'halt decline and restore healthy, sustainable populations of native species'.
5. The purpose, vision and focus all refer to working together in partnerships, including between government agencies and Māori. Whilst the strategy focuses on threatened species, there is intrinsic linkage with regional council work on habitats, predator control and engagement with landowners, iwi and community/catchment groups. Therefore we support the emphasis in the strategy on collaboration. However, consultation with the regional councils during the drafting of this threatened species

strategy sector was inadequate. There is an ongoing need for greater involvement of regional councils at strategic decision making and policy level, particularly where issues impact the regional sector. Additionally, the protection of taonga species is integral to Māori and consultation with Māori in the development of strategies and policies should be carried out.

## Tools

6. The prioritisation of species recovery using DOC's natural heritage prioritisation tools takes into account the conservation status and uniqueness of species, the ecological condition and potential for improvement of ecosystem management sites, and the cost of management. The strategy also promotes the use of spatial planning tools to identify and prioritise Ecological Management Units (EMUs). Currently there is no consistent approach to prioritising sites between DOC and other biodiversity players across land tenures and regions. Halting the decline of biodiversity would benefit from a move to a more consistent, systematic, and universally applied prioritisation approach to identify ecosystems and habitats to manage threats on.
7. The critical role of biosecurity and research into biocontrols has been identified in the strategy. The recent Parliamentary Commissioner for the Environment report 'Taonga of an Island nation' stated that research into predator control should be strongly supported as well as use of genetic techniques to control predators. The control of plant and animal pests is a core mechanism of biodiversity management. In the regional council sector submission to MPI with regards to Biosecurity 2025 direction, it was noted that tackling this challenge will rely on a whole of system approach and clear strategic direction is needed to ensure that limited resources are employed into the greatest areas of need. In this submission, we emphasis again the need for a whole of system approach and clear strategic direction for a more effective joined up approach on predator control.
8. A tool on regulation has noted limited powers in legislation to protect biodiversity on private land without the owner's agreement and the development of the proposed biodiversity NPS as well as marine protection. Any change in regulatory tools will have significant implications for the regional sector, particularly given management of land use and engagement with landowners. There is a need to consult with the regional council sector in developing legislation to help make it fit for purpose.
9. The regulation section on page 25 lists legislation that can provide protection (the Wildlife Act 1953 and the Freshwater Fisheries Regulations 1983) and notes that there is no direct legal protection for plants. A review and overhaul of existing legislation as part of the regulatory reform is needed and whether there is adequate protection for threatened species, including the use of regulatory powers should be strongly considered.

## Strategy and goals

10. Strategic themes are largely based on existing initiatives where work is already being done such as Predator Free 2050. The themes also note in working together in partnerships that the government will continue to provide leadership for the conservation of our natural environment. There is a continuing need for more formal partnerships and strategic governance including with the regional council sector. Regional councils support the need for formal partnership arrangements, with effective leadership and governance that would provide collaboration in the identification, prioritisation and delivery of biodiversity projects. It would also ensure roles and accountabilities are clear and strategic and operational issues are identified and managed.
11. The strategy links up with mātauranga Māori and research programmes such as national science challenges and conservation and science roadmap to collectively build our science and knowledge base. Within the threatened species strategy there is little consideration of future pressures or opportunities, and therefore capabilities needed going forward. For example, increasing incursion and response pressures are likely to face the system in the future. In setting out strategic frameworks there is a need to consider what future pressures and capabilities may be required.
12. The state of our species graphic on page 12 is inaccurate and misleading as the percentage proportion of species does not match with the bars. For example, the 4 of 5 bats threatened/data deficient look more like 40% not 80% of the bar graph displayed. It is also unclear whether threatened species includes at risk species.

## Actions

13. It is unclear what actions are going to arise out of this particular strategy as a number of the actions are based on existing initiatives underway such as Predator Free 2050, Biosecurity Direction Statement 2025 and regulatory reforms.
14. Given that the actions span across a number of initiatives and biodiversity stakeholders, clearer actions are needed with measurable objectives and key performance indicators to be more specific about what this strategy aims to achieve. Clearer actions with early consultation on what is intended by the actions is crucial to ensure that regional councils have clarity as to what will be required. This should also include accountability for delivery and expectations. For example, it is unclear what the action to identify and publish threatened species 'hotspots' on and off public conservation land will require regional councils to do.
15. Page 3 of the Threatened Species Strategy states that the clear species goal will also guide decisions by local councils in their biodiversity work. With the inclusion of this list of species now within a strategy, it is important to understand whether priorities will change for species not listed and whether existing or future planned projects will be

impacted with the reallocation of resources. Ongoing collaborative work is needed with regional councils and other partners to ensure that limited resources are employed into the greatest areas of need.

16. There are also concerns about the constraints of existing budgets and lack of additional funding behind this strategy. Work should be undertaken, if it hasn't already, to determine current capacity and capability of DOC and partners to deliver these actions and future capability needs. With this a further understanding of what work programmes will be initiated or if work will be reprioritised as a result of this strategy, outside of existing initiatives. Given links between habitats and threatened species work, it is imperative that regional council sector understand whether resources will be reallocated and the impact on existing or planned DOC funded or part-funded partnership projects or implications for ratepayers.

## **Species**

17. 150 species currently being managed for protection have been selected to be enhanced. The strategy recognised that some ecosystems contain numerous threatened species and it will be important, given the overlaps with work in protecting habitats, that prioritisation of species/ecosystems is done in collaboration with regional council sector for effectiveness. There is a need for a more consistent approach to prioritisation amongst regional councils, between regions and other players.
18. The strategy notes that DOC will monitor those not actively being managed and react if there is a threat of extinction. A flexible approach is imperative if there is a change in situation such as an emerging pest threat. It is unclear that if another threatened species emerges, will other species drop off the list or will the list be added to? No indication was given on the timeframe that the list would be reviewed and updated, and whether this would be regular or on a case by case basis. It is important to understand whether work in ecosystems will be reprioritised if other species become more critical. A more collaborative biodiversity framework would allow for DOC and regional councils to share information on biodiversity, including state, threats and pressures and effectiveness of interventions.

## **Concluding remarks**

19. The strategy is a good overarching summary of current initiatives relating to the halt of the decline of threatened species and enhancing of populations. However, it is unclear what will change as a result of this strategy in absence of clear direction and direction on what it is regional councils will be expected to do as a result of this strategy.
20. Consultation and greater ongoing involvement of regional councils and other partners at a strategic decision making and policy level is needed, given council's role in the management of land use and its effects on ecosystems and indigenous biodiversity as

well as freshwater biodiversity. Implementation of more formal statutory partnership arrangements between DOC and the regional council sector would foster this needed consultation.

21. A more formalised collaborative biodiversity framework would also allow for DOC and regional councils to align in the identification, prioritisation and delivery of biodiversity projects and share information on biodiversity, including state, threats and pressures and effectiveness of interventions.
22. We wish to continue to develop and work in consultation with DOC to address challenges and make positive improvements to protecting, maintaining and restoring threatened species.

### **For further enquiries**

Please contact: Cecilia Ellis, Senior Strategy Advisor

[Cecilia.ellis@ecan.govt.nz](mailto:Cecilia.ellis@ecan.govt.nz) 027 404 4817