

Environment Canterbury submission on Te Koiora o Te Koiora: Our shared vision for living with nature

Overall comments

1. Environment Canterbury welcomes Te Koiora o Te Koiora, the Department of Conservation (DOC) discussion document on proposals for a biodiversity strategy for New Zealand to replace the current strategy. Development of a new strategy for the first time in two decades provides a **significant opportunity** to set a clear direction for the transformational change required to restore New Zealand's indigenous biodiversity.
2. Indigenous biodiversity is one of the two **strategic priorities** identified by Environment Canterbury in our Long-Term Plan 2018-28. Council has indicated the desire to bring about a step-change in effort to halt the decline and restore the natural character of degraded indigenous habitats and ecosystems. This requires extensive collaboration between all the organisations who are working on biodiversity projects, establishing clarity around roles and responsibilities, providing information and incentives for private landowners to invest in maintaining biodiversity, and leveraging each other's work to optimise results in as short a time frame as possible. We invest significant resources in biodiversity management, and in monitoring and reporting against biodiversity measures.
3. Environment Canterbury supports the overall intent of the strategy. However, we are concerned the proposal has **missed two key opportunities**. We consider that:
 - The proposed strategy **does not set a direction that is strong or bold enough to lead to significant change**.
 - The proposed strategy **does not provide a coherent, overarching view of the biodiversity system**, either currently or what it might look like in the future. Further work is needed to link together existing and planned components of the biodiversity system in a coherent way. This should include clearer articulation of roles and responsibilities within the system.
4. Environment Canterbury endorses the independent findings and recommendations of the Enfocus report "Addressing New Zealand's Biodiversity Challenge" (2014) which identified five key shifts that are required to achieve improved outcomes for New Zealand's biodiversity. We consider this report provides guidance on the key matters addressed in the strategy.
5. We support an initial focus on setting up a more **structured, well coordinated biodiversity system**, as captured by the first proposed system shift of "Getting the System Right".
6. Environment Canterbury is grateful for the opportunity to provide comment in this discussion document. We **welcome further opportunity** to work with the Department of Conservation on development the new strategy.

Part 1: Problem definition and context

7. Environment Canterbury is concerned that in trying to be 'all things to all people' the strategy has lost clarity of the **key issue of indigenous biodiversity loss**. We agree that the strategy needs to generate buy-in from many different sectors and people, however it must be confident in its primary aim of protecting and restoring indigenous biodiversity.
8. The discussion document does not adequately **define the problem** of biodiversity loss. We recommend the strategy more clearly articulates the scale, urgency and implications of biodiversity loss and more clearly communicates that loss of New Zealand's indigenous biodiversity matters on a global scale.
9. The discussion document does not adequately address the **wider context** of biodiversity loss, including a full explanation of key drivers and pressures, and the challenges of addressing these pressures. In particular:
 - We are disappointed that there is limited analysis of why the **current biodiversity strategy, *Our Chance to Turn the Tide***, has failed to protect indigenous biodiversity, or how these lessons will be applied in development of a new strategy.
 - We strongly agree that biodiversity loss is driven by the failure of our decision-making and economic systems to account for the full value of biodiversity, and that our legal and regulatory frameworks are not achieving enough (p16). Shifting decision-making frameworks to account for the full value of biodiversity must be a priority. We recommend that a discussion of **fundamental drivers**, and a commitment to finding ways to address them, is expanded on and given prominence throughout the strategy.
 - The discussion document does not adequately address **habitat loss on private land** as a significant driver of ongoing biodiversity loss. The strategy should give more consideration to options for improving the protection and restoration of biodiversity on private land. We have suggested some priority focus areas under *System shifts and priority actions*.
 - The discussion document does not adequately address **large-scale land use changes** as a leading driver of biodiversity loss. The strategy should provide more direction on how the biodiversity system can address risks associated with anticipated large-scale land use change, for example afforestation driven by climate change mitigation policy.
 - More generally, we recommend clearer explanation of **climate change** as a driver of biodiversity loss, and of how the biodiversity strategy will integrate with climate change policy.

Strategy framework

10. As a whole, the discussion document does not provide a **logical framework** that clearly links the priority actions, system shifts, goals (mapped across the three timeframes of 2025, 2030 and 2050), long-term outcomes and the vision. This issue needs to be addressed.
11. The framework diagram (p27) does not succeed in linking the strategy elements together in a coherent way. For example, while we support the integration and use of Te Ao Māori concepts throughout the strategy, the poutama as it has been applied here does not provide a clear link between actions, long-term outcomes and the vision.

Vision, values, principles and long-term outcomes

12. Feedback on the proposed vision, values, principles and long-term outcomes is provided as supplementary feedback (Attachment 1).

Goals

13. Environment Canterbury strongly supports the intent to develop a set of clearly defined, realistic and measurable goals; particularly given that a lack of measurable targets was highlighted as a failing of the existing strategy. However, as they are currently framed, it is **difficult to envisage how many of the proposed goals will be meaningfully measured**. This needs to be addressed. We recommend a shift from qualitative to quantitative language where possible, and that a measurement framework is considered for each goal before it is included.
14. More specific feedback on proposed goals is provided as supplementary feedback (Attachment 1).

Governance, reporting and review

15. Governance will be critical to the success of the strategy. Early priority must be given to establishing a **national-level governance** structure, to provide ongoing direction, hold responsibility for strategy implementation, promote accountability through clear roles and responsibilities, and ensure secure, adequate resourcing for the biodiversity system. The governance structure must provide sustained leadership for the lifetime of the strategy, including through political change.
16. Environment Canterbury fully supports the need for robust **reporting and review** of the strategy. We suggest that reporting should occur on a shorter timeframe than five years, particularly as the strategy is aiming for an initial set of goals only five years from now.
17. National-level governance must be supported by effective **leadership at regional and local levels**. Therefore, priority should also be given to building and maintaining well coordinated, effective governance across all levels of the biodiversity system. An

effective multi-level governance structure should make it easy to link locally-led initiatives to regional priorities and national direction.

Implementation planning

18. Success of the strategy will depend on effective implementation. We strongly support the commitment to implementation planning following release of the strategy.
19. **Key stakeholders including local government must be involved** in implementation planning from the beginning. We work successfully in collaboration with DOC on biodiversity programmes across Canterbury, for example in braided river ecosystem management and as part of the Mackenzie Basin Agency Alignment Programme. We look forward to further enhancing our relationship with DOC, by working with DOC and all parties to establish governance structures, develop implementation plans and contribute to ongoing strategic direction for the national biodiversity system.
20. Generating buy-in from stakeholders—which will be critical to successful implementation—will depend on a clear articulation of how priority actions **align with existing central and regional government initiatives**. At this stage, it is not clear how priority actions relate to initiatives already planned or underway. For example, it is unclear how a targeted review of natural resource legislation relates to upcoming RMA reforms (p40), or why integration of biodiversity values in the One Billion Trees programme (which is already underway) is not an immediate priority (p53).
21. Implementation planning must **consider resourcing** as a priority issue. This should include investigating options for increasing financial resources available for the system as a whole; particularly if implementation is to include, for example, resource intensive landscape scale projects or investment in an improved national monitoring framework.
22. Buy-in from **private landowners** is critically important. We note there is a risk to implementation if landowners perceive the biodiversity strategy as a burden on top of existing biodiversity rules and regulations, as opposed to providing clarity and consistency as an important piece of the biodiversity management package. Partnering with industry **sector groups** will be important, as these groups play a key role in working between government and landowners to achieve biodiversity outcomes on private land.

System shifts and priority actions

23. Environment Canterbury recommends that the system shift “**Getting the System Right**” **is the critical area for investment** over the first five years of the strategy. As part of “Getting the System Right”:
 - We strongly agree that the strategy should prioritise a **review of the current institutional and legislative framework** for biodiversity management, to ensure it is coherent and fit for purpose, and to **clarify the roles and responsibilities** of all

parties involved in managing biodiversity. This was one of five key changes recommended by the Enfocus report (2014).

- We recommend that initial priority should be given to setting up a **national governance** structure to provide continuing leadership for the strategy (see *Implementation planning*).
24. We agree that **tangata whenua must be empowered to exercise kaitiakitanga** through involvement at all levels of the biodiversity system, including at the system design stage (Shift 2). **Communities must also be empowered** to act as stewards for our indigenous ecosystems (Shift 3). However, both of these priorities must be backed by a well-structured biodiversity system and long-term commitment of central government resource.
25. Setting up a structured, well coordinated national biodiversity system must be the initial focus. However, we have also highlighted (under *Part 1: Problem definition and context*) a need to investigate options for addressing **biodiversity loss on private land**. We anticipate this will be one focus area during implementation planning, which will benefit from engagement with the regional council sector. In particular, we highlight the following priorities:
- The discussion document does not adequately consider that local government already has a range of regulatory tools at its disposal, which have been underutilised or applied inconsistently across the sector for several reasons including through a lack of resourcing, capability, or political will to regulate and enforce. One example is vegetation clearance rules, which have often been ineffective in protecting indigenous biodiversity due to being too permissive or poorly enforced. The strategy should prioritise investigating barriers to the **consistent and effective use of existing regulatory tools** and find ways to better provide for their use.
 - Central government guidance or direction to use **up-to-date and effective data collection methods**, including satellite imagery, would enable regional councils to more effectively identify, monitor, and enforce if required, to protect areas of significant biodiversity.
 - The strategy needs to consider wider use of **economic tools** for landowners responsible for biodiversity outcomes on private land. Economic tools could play an important role in addressing the fundamental driver of biodiversity loss (as identified in this discussion document); that is, a failure to account for the full value of biodiversity or to capture the cost of activities that degrade indigenous ecosystems. Incentivisation tools are more common in other jurisdictions and limited use of incentives has been a failing of our biodiversity system to date.
 - We support action to **scale-up existing schemes and community-led initiatives** with strong track records in delivering biodiversity outcomes on private land. This includes legal protection schemes (such as Queen Elizabeth II National Trust and Ngā Whenua Rāhui) as well as community-led restoration programmes, which play an important role in our biodiversity system and are well-placed to achieve more with greater security of long-term funding.

- The discussion document does not address the need to promote a shift from homogeneous land use to **mixed land use models**. Managing rural land for multiple values, including biodiversity, landscape, cultural, recreation and production values, is common in other countries. We recommend investigating options for promoting this shift.
- As highlighted in the Enfocus report (2014), we support a shift to a **systematic, nation-wide monitoring framework** for indigenous biodiversity, across all land tenures, supported by central government. We also support action to facilitate **better sharing and integration of biodiversity data** across central government, local government, industry, iwi and community groups.

Attachment 1: Supplementary feedback on strategy elements

Vision

26. We support the proposed timeframe to 2070. We agree that the timeframe must be long enough to encourage thinking beyond the short term and communicate that restoring biodiversity will require sustained long-term commitment across all sectors.

Principles

27. We wish to raise the following concerns and suggested amendments regarding the proposed principles:

Principle	Feedback
<p><i>Tools – A mix of regulatory and non-regulatory tools should be used to achieve the best outcome, recognising that incentives, regulatory guidance and backstops are important elements of an effective response.</i></p>	<p>We strongly support this principle, and suggest strengthening the wording to: “A mix of regulatory and non-regulatory tools <i>will</i> be used to achieve the best outcome, recognising that incentives, regulatory guidance and backstops are important elements of an effective response”.</p> <p>The strategy needs to be clear that regulatory and non-regulatory management options must be used together.</p> <p>We strongly recommend that the strategy remains open to using a wide range of tools to protect biodiversity on private land, from long-term community engagement processes through to more urgent, decisive action. For example, in some circumstances land purchase may be the most effective (including cost effective) way to protect biodiversity values at a specific site.</p>
<p><i>Respect for property rights – Respect for property rights and their associated responsibilities is essential to ensure a collaborative partnership between resource owners and users and public agencies.</i></p>	<p>It is not clear what the implications of this principle are or how it would be applied.</p>

28. We recommend inclusion of the following additional principles:

- *Protection* – Focus first on protecting existing indigenous biodiversity, and then on restoring what has been lost.
- *Prioritisation* – Prioritisation is carried out on the basis of ecological values in the first instance.

Long-term outcomes

29. We wish to raise the following concerns and suggested amendments regarding the proposed long-term outcomes:

Long-term outcome	Feedback
<p><i>Non-indigenous species and ecosystems are managed to maintain or enhance indigenous biodiversity, while providing for the cultural, economic and recreational values that non-indigenous species provide.</i></p>	<p>We support the first half of this outcome (that non-indigenous species are managed in a way that maintains or enhances indigenous species).</p> <p>However, we do not support the use of a national biodiversity strategy as the appropriate instrument to <i>provide</i> for the cultural, economic and recreational values of non-indigenous species.</p>
<p><i>All New Zealanders can connect with nature and recognise its value in supporting intergenerational wellbeing.</i></p>	<p>We are more ambitious, and suggest we should aim for New Zealanders to recognise the value of biodiversity within a shorter timeframe. We also recommend a more active framing of the need to build and enable strong connections / relationships between people and nature. A more appropriate long-term outcome would be that all New Zealanders, including future generations, <i>experience</i> a connection with nature.</p>
<p><i>Aotearoa New Zealand is making a meaningful contribution to global biodiversity management</i></p>	<p>We suggest that a stronger statement would be more inspiring and empowering: for example, 'Aotearoa New Zealand is recognised as a global leader for the protection, restoration and enhancement of biodiversity'.</p>
<p><i>Tangata whenua are exercising their role as kaitiaki</i></p>	<p>We strongly support the intent of this outcome: i.e. the empowerment of tangata whenua at all levels of the biodiversity system, and the re-establishment and enabling of cultural practices that rely on thriving indigenous ecosystems and species.</p> <p>However, we are uncomfortable with the way this outcome is currently framed, given that its scope is much wider than biodiversity management. Tangata whenua must be empowered to exercise their role as kaitiaki for many reasons, and the role of kaitiaki extends beyond the protection and restoration of biodiversity values.</p>
<p><i>Aotearoa New Zealand's indigenous biodiversity is managed to be resilient to the impacts of global change</i></p>	<p>We suggest this outcome is expanded to include that nature-based solutions that enhance biodiversity values play a significant role in actions to mitigate and adapt to global change.</p>

Goals

30. The strategy must be clear about the baseline date or starting point for measurement of goals. For example, it is unclear whether the 2025 goal *'No further decline in the number and extent of coastal and freshwater wetlands'* means no decline over the 2020 to 2025 period, or no decline from 2025 onwards.
31. It is unclear how the goals fit within the strategy framework. We would like to see a clearer link between the goals (mapped over the three timeframes) and how they contribute to the long-term outcomes.
32. Environment Canterbury strongly supports all goals relating to no further loss and eventual increase of indigenous habitats and ecosystems. We recommend adding goals, for all time periods, relating to no further loss and eventual increase of threatened indigenous species.
33. We support an immediate focus on the protection and restoration of wetlands and braided river ecosystems, both of which are priority areas of biodiversity management for Environment Canterbury.
34. We wish to provide the following specific feedback on some of the proposed goals:

2025 Goal	Feedback
<i>No further decline in the number and extent of coastal and freshwater wetlands</i>	We strongly support the immediate focus on wetland ecosystems. We note, however, that given the current trajectory of wetland loss this is an ambitious goal to achieve within five years.
<i>All areas of significant biodiversity on land mapped and protected</i>	We agree with the intent of this goal. However, we are concerned that it is ambitious, particularly within such a short timeframe. We are also keenly aware that achieving this goal will be challenging, given that a significant amount of remaining biodiversity is on private land. Achieving this goal may require a centralised mapping initiative, as a considerably more cost and time efficient approach than region-by-region mapping.
<i>Threats from climate change comprehensively integrated into species management plans and strategies</i>	We support this goal and suggest addition of a goal relating to the use of nature-based climate change (mitigation and adaptation) solutions that protect and enhance biodiversity.
2030 Goal	Feedback
<i>Achieving biodiversity outcomes is a part of standard farming practice</i>	We fully support this goal and suggest it is brought forward to 2025, given that loss of habitat on private land is a significant driver of biodiversity loss, and that this outcome is something that we are already working towards with the Canterbury farming community.

<p><i>No net loss of extent of rare and naturally uncommon terrestrial indigenous habitat (active sand dunes, braided riverbeds, estuaries, cloud forest etc.)</i></p>	<p>We strongly support this goal, and recommend it is extended to no net loss of extent <i>or quality</i> of rare and naturally uncommon indigenous habitat.</p>
<p><i>Ten key freshwater pest species and ten key land-based weed species are reduced or controlled</i></p>	<p>We recommend adding (or replacing this goal with) site and/or value-led pest management goals. Biodiversity outcomes may be better achieved by a more strategic pest management approach, which focuses on protecting specific values in specific areas, rather than country-wide eradication targets.</p>