

Auckland Conservation Board

National Biodiversity Strategy Submission: Te Koiroa o te Koiora

17 September 2019

Overview

The draft strategy *Te Koiroa o te Koiora* and action plan summary summarise well Aotearoa's biodiversity crisis. It also summarises the aspirations of mana whenua, community and other stakeholders to restore abundance across all ecosystem types and avoid extinctions, and highlights the need to work collaboratively to an appropriate set of principles to do so, covering human interests, threat management and system level change.

The proposed vision is appropriate, but for the extent of the crisis we face now, 50 years is too long a timeframe. We are awash with diagnoses and vision – Sea Change and Predator Free NZ 2050 are two examples. Implementation is key. The strategy lacks urgency and is not specific enough about the action required. In particular, there is not enough focus on

- targets and actions needed in the short term (5 years)
- defined targets and actions to address the greatest species and ecosystem risks nationally (including marine and freshwater domains)
- defined targets and actions to address damaging land use and behavioural practices in local government, business and the community
- accountabilities for delivery (legislative and non-legislative).

The biodiversity crisis needs a strategy that reflects Auckland's unique risks and treasures

Unfortunately, the Auckland region faces a **more acute set of threats to biodiversity and habitat loss** than any other region in Aotearoa. This is due to historic biodiversity loss and habitat degradation across marine, freshwater and terrestrial domains; made worse by increased development, damaging land use practices, population growth, increased urbanisation, reduced tree cover, and worsening climate impacts (including severe weather events, sea level and sea temperature rise and biosecurity risks).

Yet the region is blessed with treasures – some of our most precious island sanctuaries, Tikapa Moana/Te Moana Nui a Toi (a global seabird hotspot), kauri and coastal forests and three unparalleled harbours. A national strategy should recognise these and others and include goals for their protection and restoration.

What is missing from the strategy?

In this context, the proposed strategy needs to be reinforced in the following ways to address biodiversity loss in the Auckland region. Note that addressing these gaps will benefit other regions of Aotearoa and many are system level gaps:

1. Highlight the need to **change land use and urban design** to avoid further habitat degradation/loss and to reduce sediment and runoff from deforested land, development and farming into marine and freshwater environments
2. Highlight the importance of **upholding the intent of legislation at the local level** (current and future) to achieve better outcomes for biodiversity. This means ensuring Auckland Council, private landowners and the development sector act collaboratively to change

behaviour and compliance and update planning and regulatory frameworks. These need to move from minimising adverse effects to achieving positive biodiversity outcomes from growth. Iwi rohe plans should also play a role. Local government decision makers will need more support to reflect biodiversity requirements and ensure legislation and NPSs have the intended effect.

3. Increase the **focus on marine environments and biodiversity**, in particular to reduce the impacts of overfishing, sediment/runoff and plastic on the health of the Gulf ahead of increased sea temperatures. Establish targets for marine biodiversity (eg fish species, marine mammals, seabirds, reef, benthic systems, water quality). The State of Our Gulf and Sea Change processes clearly identify the current declines and changes required. Marine threats and goals require more attention in the strategy overall – we are an island nation.
4. Increase the **focus on freshwater biodiversity** – the NPS Freshwater and Auckland Council’s new Water Strategy do not set goals or targets for freshwater biodiversity. This is a gap which should be addressed in this national strategy. Implementing catchment management, within rohe environmental goals, with the intent of reducing cumulative effects and enhancing biodiversity outcomes must form part of this strategy if freshwater biodiversity trends are to reverse.
5. Create an **outcomes and performance framework** with specific measures and targets by species and ecosystem type across domains, which is granular enough to set direction in a region such as Auckland (or any other). There are no regional biodiversity targets for Auckland and without these how can planners and regulators, NGOs or agencies define the actions required at the place (and thereby ecosystem) level to arrest current declines. The framework should include behavioural targets to ensure human and land use impacts which drive biodiversity outcomes can be considered together.
6. Include a **risk based view of NZ’s species and ecosystem problems** and map this spatially to input into regional planning. This is a national strategy but there are hot spots of risk to biodiversity which must by definition be prioritised in order to avoid extinctions. For example in Auckland, seabird and shorebird extinctions due to food supply/plastic/sea temperature and predation effects, loss of some freshwater environments and species, kauri, etc. The short term focus on predator control, community effort and biosecurity is not going to address all the short term risks, especially not in marine or freshwater.
7. Include a specific **focus on individual behaviour and defining expectations** of people living, doing business in and visiting Aotearoa, in relation to biodiversity and natural habitats. The strategy talks about empowering people to connect with nature, but needs to be more explicit about the expectations of behaviour that flow from the principles in the strategy. There are examples of “codes” of behaviour (eg Palau, Hauraki Gulf Treasure Islands, DOC). Changing mindsets and creating social norms that protect biodiversity from human impact are critical in Auckland where more than a third of the population and economic activity occurs.

Response to Consultation Questions

See online form here: <https://www.doc.govt.nz/biodiversity-consultation>

Q1. How well does Part 1 of the Discussion Document set out the problem and consider the challenges and opportunities facing nature now and in the future?

It covers the key points and these have been well understood for some time. Given the gravity of the situation and our poor international performance, the short term goals are not aggressive enough. In particular, land use change and growth/development are as critical as is biosecurity risk, particularly in the Auckland Region. Seabirds in particular need more safe havens and less fishing pressure in their breeding and feeding areas. There is insufficient attention paid to marine biodiversity in a nation surrounded by the sea. More action, targets and accountabilities need to be included.

Please refer to attached submission document for more detail.

Q2. What do you think of the proposed strategy framework? Does it provide a useful way of linking the elements of the strategy together?

It covers most of the key points. However the framework is not specific about land and resource degrading or reducing habitat as threats, which they clearly are for biodiversity across all three domains – marine, freshwater and land. Climate and pests are not the only threats. The te reo values may need to be translated for non-speakers.

Please refer to attached submission document for more detail.

Q3. What do you think of the proposed vision for Aotearoa New Zealand and its timeframe?

I definitely would support this vision

I probably would support this vision

I probably would not support this vision

I definitely would not support this vision

Please explain your choice

The vision is good but the timeframe is too long. A 30 year vision is more appropriate and actionable. This timeframe also aligns better with PF2050, and other related strategies and plans.

The detail in this section lacks detail about marine biodiversity. There is also an assumption of economic growth, where economic activity and development may be more applicable terms, given the global outlook.

Does it reflect mana whenua aspirations?

Q4. What do you think about the proposed values and principles? Is there anything you would add or change? Which of the values and principles do you think are most important?

The values are comprehensive and appropriate. However, they require that the strategy elsewhere clearly defines who is meant by “we”. If local government, the development and infrastructure sector and primary industries including fishing and farming are not identified as having a role in the strategy then it will lack impact.

Add: an additional principle is needed: “*Delivering action*” -which in turn translates to better biodiversity outcomes

Change: Sustainable use is a difficult principle to include if the working assumption is that historic use can continue. By definition, historic use has not been sustainable, which has led us to the current crisis. It follows that there must be some change to the level of use of biodiversity and ecosystems for the vision to be achieved and for adverse outcomes to be avoided.

The most important principles: Courage, Indigenous biodiversity, In situ management, Outcomes

Q5. What do you think about the proposed long-term outcomes? Is there anything you would add or change?

Add to Whakahou: taking personal responsibility to behave in a way that is “tika” for Aotearoa’s indigenous biodiversity, whether you are in the community, business or government.

Add to Wananga: the way we develop land and cities/towns does not reduce natural habitats or negatively impact biodiversity

Please refer to the attached submission document for more feedback on the need for a specific targets and measures framework.

Q6. What do you think about the proposed set of goals? What are the most important things to track to measure our progress? What else should be included?

Please refer to the attached submission document for more feedback on this. In implementation planning, these goals will need to be developed and tested at a local level to identify the right priorities – then rolled to a national picture which has been ground truthed.

For 2025 add:

- Defined goals for changes to and use that can turn around some of the long term habitat declines and removal/modification of habitats
- Specific marine protection targets to provide seed areas for fish stocks and to support long term recovery, coupled with marine biodiversity monitoring and targets
- Targets for the levels of plastic entering key bodies of water – in particular the Hauraki Gulf/Tikapa Moana/Te Moana Nui a Toi
- Freshwater biodiversity targets to prevent local and national extinctions
- Revised sediment, runoff and water quality measures to reflect the reductions required to turn around key ecosystems (such as streams, the three Auckland harbours and the Gulf)
- Targets for changes in public and business perceptions of the biodiversity crisis (it’s not ok) and what is “tika” behaviours.

These should flow through into the subsequent time periods in the strategy.

Q7. What do you think about the proposed plan for implementation planning? What do you think are the requirements for a governance structure to oversee implementation planning and delivery?

The timeframes need to match the urgency of the problem. The identification of specific short term targets and actions at the regional level based on existing data and within existing legislation should be included as a discrete first implementation steps. This could be connected to the release of the

draft NPS Biodiversity. It will ensure there is momentum created to support the groundswell of change we are observing in the community now.

Please refer to the attached submission document for more context.

Q8: What do you think about the proposal for progress reporting and review of the strategy? How do you think this reporting should take place to ensure it is useful, transparent, inclusive, and drives accountability?

Again, given the crisis, reporting should be more regular and agile than a traditional central government strategy. New mechanisms should be considered. For example, a national biodiversity scorecard with regionally specific and even catchment or place based views, with measure updated annually where practical. There is not enough time left to turn around key species and ecosystems to adopt a “wait and see if it works” reporting mindset.

Q9: What do you think about the five system shifts? Are they the right areas to focus on in the near term? Are there other areas that should be included?

Please refer to the attached submission document for more feedback on this.

Q10: What do you think of this system shift? Getting the system right. Do you agree with the proposed first steps? What other actions should be included?

This is in practice the most critical shift. Without the back up of local and central government (or “the system”) to ensure damage to biodiversity ecosystems does not continue, the efforts of communities and iwi are stifled and frustrated. The current agencies do not collaborate well at place and there is a place of place based planning and effective management (the Hauraki Gulf is an acute example of this). A mandatory NPS covering marine, freshwater and land biodiversity which all agencies must implement is key.

Place based plans such as catchment plans and rohe plans with place specific goals and targets would be an effective catalyst for change. This supports change at a more granular level than regional biodiversity plans and is potentially a much quicker route to outcomes at place. Such a process requires a focus on outcomes and a collaborative approach between iwi, all agencies, landowners and communities which considers biodiversity risk and value within specific ecosystems (as envisaged in the mountains to sea shift below). The Kaipara case study sets a precedent, yet there is still a proposal to create a landfill in a tributary of this harbour and fishing, growth and agricultural pressure degrading this ecosystem. In Auckland there are very few catchment plans in place and any catchments are in poor health. Many iwi with significant areas of indigenous biodiversity are not well resourced to facilitate rohe based plans. Even on inhabited gulf islands such as Aotea and Waiheke, there are as yet no joined up island plans between agencies, iwi, landowners or the community, setting biodiversity, biosecurity and ecosystem targets. This would improve prioritisation, speed of delivery and effectiveness of investment and should be included in the strategy.

Please refer to the attached submission document for more feedback on this.

Q11: What do you think of this system shift? Empowering kaitiakitanga and matauranga Maori. Do you agree with the proposed first steps? What other actions should be included?

Agreed. Each iwi could be supported and resourced to develop a rohe level plan to ensure biodiversity is protected and restored to abundance. In Auckland, where biodiversity loss, degradation of habitats, development pressure and biosecurity risk are all acute, this is particularly

important to support directly. The planning frameworks and regulatory compliance systems must back this up on the ground. Targets should be set in the strategy for completion of these plans and compliance with them within local government activities in the short term 1-3 years, depending on individual iwi circumstances.

Q12. What do you think of this system shift? Communities are empowered to take action. Do you agree with the proposed first steps? What other actions should be included?

Agreed. However see attachment for more context. In particular, this shift needs to include the marine environment. Behaviour change and establishment of new social norms should also be explicitly highlighted – otherwise the strategy lacks teeth. There are direct human impacts which are in the control of individuals to change – including sustainable recreational fishing, no take areas for restoration and acceptable behaviour around wildlife eg dogs and vehicles on beaches, protecting indigenous vegetation in urban and growth areas, restoration of waterways and reducing or eliminating the use of plastic. It is important to ensure all people value nature but this on its own will not address harmful behaviours and attitudes.

Q13 What do you think of this system shift? Connecting ecosystems from the mountain tops to the ocean depths. Do you agree with the proposed first steps? What other actions should be included?

Agree. In the Auckland region this is particularly important in relation to the health of harbours and the Hauraki Gulf. What is frustrating is the lack of urgency in local and central government to change land use, tackle overfishing and prevent further degradation of marine and freshwater habitats.

Please refer to the attached submission document for more feedback on this.

Q14. What do you think of this system shift? Innovating for the future. Do you agree with the proposed first steps? What other actions should be included?

Agree. A national spatial view of ecosystem risk and priorities which combines regional council, DOC and other data views will help define national priorities and top biodiversity risk areas. Within Auckland, this view will be helpful for the development of place-based plans (eg catchment, harbour, rohe or island based). The technology is available to do this, it is a question of collaboration between data holders and potentially the creation of a national body to hold and report on spatial monitoring data.

Marine and coastal areas should be included in this work. The strategy is not specific on marine biodiversity data and it needs to be.

Q15. Overall, are these the components of an effective strategy? What do you think of the proposals as a package? Is there anything we have missed?

Overall, yes, but please refer to the attached submission document for detailed feedback on this. In particular the inclusion of marine environments, emphasis on non-climate threats to biodiversity in the framework and throughout, and how targets and compliance will be embedded in local government processes.

Q16 What do you think a global vision and targets for biodiversity should look like? Are they the same as what is proposed in our national strategy, or should they be different? Are there any other things that should be included in the global framework? How do we make sure that our national strategy aligns with global goals?

A number of threats to New Zealand's biodiversity come from elsewhere. Climate change is a global threat to all biodiversity but is covered by other strategies. This biodiversity strategy should clearly identify actions which will address those threats and how these will be advocated for in global strategies and the relevant national strategies. For example:

- For pelagic seabirds such as the takoketai/black petrel, what are the specific actions that will ensure that fisheries by catch reduces in the Pacific and Southern Ocean
- For migratory birds (important for the Auckland region with its harbours and Gulf populations) what are the key sites that require protection on migratory routes and in breeding locations. For migratory fish and marine mammals, the issue is similar.
- Engagement with visitors arriving by boat or by air on the "tika" ways of behaving in New Zealand when visiting this place
- Engagement with the business sector on legislation and planning frameworks which require compliance in New Zealand.

A global framework must work bottom up as well as top down. New Zealand is demonstrating intention and goals in this strategy which should be effective elsewhere. However it is for us to protect our own places and biodiversity and for other nations to do the same. The global strategy can aim to:

- Identify risk areas for urgent action and provide a vehicle for effective collaboration – for example on biosecurity and seabird and marine mammal protection
- Establish global commitment at the government level and within regions / key ecosystems
- Establish and seek to enforce global norms for biodiversity management and recovery
- Promote the role of indigenous knowledge and approaches in restoration.

