



Submission on the draft National Policy Statement for Indigenous Biodiversity – Exposure Draft

Sent via email to indigenousbiodiversity@mfe.govt.nz on 21 July 2022.

Introduction

1. The Hurunui District Council thanks the Minister for the Environment for the opportunity to provide feedback on the proposed National Policy Statement for Indigenous Biodiversity ('NPSIB') – Exposure Draft. The Hurunui District Council considered the exposure draft at a workshop on 7 July 2022.
2. The Hurunui district is located in North Canterbury. We have approximately 13,058 residents and cover an area of 8,646 km² spanning from the east coast across to the Main Divide. The Hurunui district is predominately rural land interspaced with small service towns. Our economy is primarily reliant on primary production and tourism.
3. We are happy to discuss any points in our feedback if this would be useful to Ministry for the Environment officials.

The Hurunui context

4. There is agreement in our district from Council and landowners that biodiversity is important and needs to be managed, not only to halt further decline, but to also achieve regeneration. However, the 'how' is contentious and has been the subject of much discussion, particularly around SNA mapping on private land.
5. There are legacy issues in our district from the last time SNA were mapped. During the development of our second-generation district plan, the Council set up a biodiversity working group to liaise with the community through a collaborative process, on a range of ways to enhance and protect biodiversity within the Hurunui district, while giving effect to the Canterbury Regional Policy Statement. The group held a diverse range of views, and some attendees withdrew early in the process, so their issues with the process were not able to be resolved.
6. Ultimately, no further research and consultation was completed and no SNAs were identified or listed in the second-generation Hurunui District Plan. The plan provides for consideration of the significance of indigenous biodiversity on a case-by-case basis at the time of resource consent. The plan includes significance criteria and provides landowners the opportunity to manage their properties through a Biodiversity Management Plan.
7. Landowner trust in this space is slowly being repaired, however, we know there are many landowners who are unlikely to react well to assessment of SNA on their land.
8. This aside we have noted there has been a shift in mindset and attitude around indigenous biodiversity protection and restoration without regulation. The landowner led groups in our district hold a vast amount of knowledge, skills and mana within our communities and are working together towards outcomes that benefit indigenous biodiversity and landowners. One example we discussed was the Hurunui District Landcare Group who, since being established in 2016, have achieved 17 km of riparian planting and 65 hectares of native planting, along with providing three catchment farm advisors who provide support to members.

Submission

9. We agree the maintenance, protection and restoration of indigenous biodiversity is important.
10. We are not in support of SNA mapping as the primary means to achieve this. We would instead like to see more focus on opportunities for collaboration with landowners, tangata whenua and existing community groups who are already achieving great outcomes for indigenous biodiversity. We support investment in these groups to enable expansion and continuation of outcomes to achieve protection of indigenous biodiversity.

Impact on rural communities

11. The impact of further regulation on rural communities should not be underestimated. A number of landowners are already feeling the pressure of other recent regulations. Conversations around indigenous biodiversity on private land require careful communication so landowners are clear what this means for them, along with the limitations, benefits and opportunities this provides to their land management practices.
12. We consider adequate support to landowners and tangata whenua is highly important. The funds identified in the draft implementation plan are a start, and we encourage the ongoing addition to funding mechanisms to help landowners and tangata whenua protect, maintain and restore indigenous biodiversity on their land. The provision of funding helps recognise the wider public good of the actions taken by landowners and tangata whenua.
13. We strongly encourage and support any measure to provide compensation/ incentives to landowners and tangata whenua, along with further investigation into a mechanism for carbon credits for indigenous biodiversity.
14. We strongly encourage and support any funding and support measures to existing community groups undertaking indigenous biodiversity work. These groups not only achieve indigenous biodiversity outcomes, but they also provide important social interaction and community wellbeing outcomes, in particular for our rural landowners.

Funding

15. We have a small ratepayer base spread across a large tract of land. Funding is always going to be an issue. With limited funds, we consider funds spent on indigenous biodiversity would be better spent on active management and engagement with landowners and tangata whenua, rather than ecologist mapping.
16. We acknowledge the \$19 million in funding to help councils identify SNAs (amongst other things). This is a start however, it will not go far when spread across the country. Further funding provided by the Government is essential to implementing the changes it wishes to see. We also want to make sure that councils, such as Hurunui, are not jeopardized in obtaining funding due to not having previously mapped SNA.

Timeframes

17. We emphasize the timeframes proposed by the exposure draft are not realistic for our district and may therefore result in undesirable outcomes. The time it will take to build political will in districts like ours should not be underestimated. We consider the process of undertaking SNA mapping and the associated plan change would require more time than the 5 years proposed. Therefore, if mapping must be undertaken, we request a longer timeframe of 10 years to undertake assessment, then five years to undertake the associated plan change. A longer timeframe would provide more time to work with our landowners at a pace that suits them, help ease (but not erase) our resourcing constraints and the financial burden by allowing the work to be budgeted and undertaken across a longer period. The longer timeframe would also

help capitalise on the shift in mindset and attitude outlined in paragraph 8, along with generational change bringing fresh ideas to land management practices.

Alignment of national direction

18. As the Ministry will be aware alignment of all national direction policy documents, and the wider legislative reforms needs to be ensured and constantly reviewed. In particular we discussed the disconnect between rules encouraging pine forest plantations and the implications this can have for indigenous biodiversity. We would like to see further recognition of indigenous biodiversity and wetland protection for carbon credits in the Emissions Trading Scheme.

Yours sincerely,

Marie A Black.

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Mayor (on behalf of Hurunui District Council)

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