

# Proposal for New Zealand's next Biodiversity Strategy

Submission by Climate Justice Taranaki, 21 September 2019

## Introduction

Climate Justice Taranaki Inc. (CJT) is a community group committed to justice, action and true solutions to our climate crisis. Our members include scientists with bachelor, masters and doctoral degrees in geography, health, anthropology and marine science. Most of us are parents or grandparents. We are community and market gardeners, farmers, writers, teachers, musicians, artists, community organisers and researchers. Most of our members and over 1000 supporters are based in Taranaki. Several of our members and supporters are tangata whenua. We raise awareness on social justice issues around climate change which impact disproportionately heavily on the under-privileged and on future generations. We advocate for policies and decisions that alleviate the impacts and empower communities. We support communities in building climate resilience.

Two of our core members participated in the regional workshop in Stratford and really appreciated the openness of the organisers from the Department of Conservation (DOC), the opportunity to contribute and the energy and expertise offered by all those who attended the workshop.

## Strategy framework

The poutama framework is an educational and useful attempt to present the overall framework of the strategy with Te Ao Māori.

## Vision

We agree with the vision presented and the ambition it reflects.

However, we caution the emphasis given to economics. We cannot agree with the statement that *“economic growth is a net restorer, not a net subtractor, of our natural environment”*.

The endless economic growth model has been the key driver to environmental destruction, ecosystem degradation, species extinction and social disparity. “Economic growth” has no place in Aotearoa’s Biodiversity Strategy. It contradicts and undermines the otherwise lofty vision of the Strategy.

We need to **boldly support and push for degrowth, steady state and circular or ‘doughnut’ economy**, with all environmental costs internalised, and social wellbeing and equity restored. A paradigm shift to the ‘doughnut’ economy<sup>1</sup> is expected to be regenerative and distributive.

We support the statement, *“Biodiversity is core to all decisions about land and water management, including on private land”*. We ask that it be strengthened to include the marine environment, by expanding it to, *“Biodiversity is core to all decisions about land and water management, including on private land, **coastal waters and in the EEZ and continental shelf**”*.

We question the extended time frame of the strategy to 2070. We propose shortening this to 2050, consistent with the initiatives for predator-free and the Zero Carbon Bill, with options to extend the time frame as necessary.

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<sup>1</sup> <https://www.kateraworth.com/>

## Values and principles

We agree broadly with the values and principles proposed.

We propose adding the **Precautionary Principle** to the principles, especially where knowledge, information and evidence is inadequate or uncertainty is too great to make informed decisions.

Add a principle in relation to Aotearoa New Zealand's international obligations, notably under the United Nations Convention for Biological Diversity (UNCBD). Article 8<sup>2</sup> of the UNCBD lists a good range of in-situ conservation efforts that we are expected to implement.

Revise and strengthen the statement under "*Sustainable use*" to take into account the need for **recovery of threatened species**, consistent with Aotearoa's obligation under the UNCBD article 8.

Under "*Internalising environmental costs*", strengthen the statement to incorporate "**avoidance and minimising**" adverse effects rather than just "*mitigating or remedying*".

Under "Connections", incorporate the need for comprehensive assessment of **cumulative impacts or effects as defined under the RMA and the EEZ-CS Act**.

As an organisation, we have taken part in numerous submission processes and hearings concerning mineral and petroleum-related activities under the EEZ-CS Act<sup>3</sup>. Based on our experience, the EPA and its decision-making bodies have never comprehensively assessed the cumulative effects of proposed petroleum activities on marine ecosystems and threatened species, as required under the EEZ-CS Act. There is great danger on marine ecosystems and threatened species when cumulative effects and other aspects of the EEZ-CS Act are not properly applied<sup>4</sup>. All too often, applications are being processed separately and their effects assessed in isolation, when comprehensive assessment of cumulative effects and the potential implications on ecosystems and threatened species are critical to ensure that they are not irreversibly harmed.

Also related to connections, it is crucial that **biodiversity conservation and restoration efforts are not planned or undertaken in isolation**. The vision and objectives of the Strategy could only be achieved when other government strategies, including the MBIE Resource (minerals and petroleum) Strategy, and all relevant legislation and forthcoming amendments, are aligned with and support it. See our submission<sup>5</sup> to MBIE on the draft Resource Strategy.

Furthermore, until the Ministry of Environment (MfE) and DOC have equal, if not greater, say in decisions over resource or spatial planning and use, the Biodiversity Strategy could be over-ridden or rendered ineffective by other government policies and agenda which are largely driven by resource extraction for economic growth. MfE and DOC need to work hard in securing a strong position in policy, legislation and planning that would not be compromised by other government agencies and their policies and decisions.

## Long term outcomes

The long term outcomes listed are worthwhile, although we also recommend inclusion of **the intrinsic value of nature** and humanity's reliance on nature for survival and wellbeing, more so than the emphasis on the benefits we may gain for our efforts to restore nature.

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<sup>2</sup> <https://www.cbd.int/convention/articles/default.shtml?a=cbd-08>

<sup>3</sup> <https://climatejusticetaranaki.files.wordpress.com/2019/06/cjt-submission-on-omv-gsb-discharge-consent-2019-application-eez100018-final.pdf>

<sup>4</sup> <https://climatejusticetaranaki.files.wordpress.com/2018/11/cjt-slides-for-epa-tamarind-hearing-8nov18-v2.pdf>

<sup>5</sup> <https://climatejusticetaranaki.files.wordpress.com/2019/09/cjt-submission-on-mbie-resource-strategy-consultation-sep19-main-body-final.pdf>

## Goals

### By 2025

Expand the 1<sup>st</sup> goal so it reads, *“No further decline in the number, extent and quality of coastal and freshwater wetlands.”*

Expand the 5<sup>th</sup> goal so it reads, *“Impacts and threats from climate change and ocean acidification and deoxygenation comprehensively integrated into species management plans and strategies.”* Move it down to be a 2030 goal.

Add new goals:

- Achieve zero bycatch of any threatened marine mammals, seabirds and corals.
- All known threatened marine species are protected from mineral and petroleum exploration and mining.
- Assessment and/or review of threatened species status for marine mammals are up-to-date.
- Assess the need for expanded ex-situ conservation of threatened species, including potential for expansion of indigenous flora seed banks<sup>6</sup>.

### By 2030

Ensure any incomplete 2025 goals are reviewed and carried forward where necessary.

Move the 1<sup>st</sup> 2030 goal, *“No net loss of extent of rare and naturally uncommon terrestrial indigenous habitat...”* up to be a 2025 goal.

Strengthen the 7<sup>th</sup> goal to read, *“Achieving positive biodiversity outcomes is a part of standard farming practice.”*

Add new goals:

- Rehabilitation and restoration efforts of at least 30% of degraded ecosystems have begun.
- Recovery of at least 30% of our known threatened species has begun, with increasing populations.
- At least 10% of the full range of our sea habitats included in no-take marine protected areas.
- Revised or new assessments of status of all threatened species, and biodiversity more generally, in accordance with IUCN recommendations for assessment on decadal time-scales.

### By 2050

Ensure any incomplete 2030 goals are reviewed and carried forward where necessary.

Move the 8<sup>th</sup> goal *“Bycatch of seabirds, corals, and marine mammals is reduced to zero”* up to become a 2030 goal.

Add new goals:

- At least 30% of degraded ecosystems rehabilitated and restored.
- At least 30% of the full range of our sea habitats included in no-take marine protected areas.

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<sup>6</sup> [https://www.massey.ac.nz/massey/learning/colleges/college-of-sciences/clinics-and-services/new-zealand-indigenous-flora-seed-bank/new-zealand-indigenous-flora-seed-bank\\_home.cfm](https://www.massey.ac.nz/massey/learning/colleges/college-of-sciences/clinics-and-services/new-zealand-indigenous-flora-seed-bank/new-zealand-indigenous-flora-seed-bank_home.cfm)

## Implementation

The proposed implementation plan is fine, except for the lack of mention about resourcing. It was obvious at the regional workshop that resourcing is a critical issue in most people's mind, especially after experiencing the previous government's devastating budget cut on DOC and the implications on the ground.

We support the users and polluters' pay principle and believe that significant resources can be raised from such avenues as fines from permit holders who have breached resource consents, substantial increase in minerals and petroleum tax, levies and royalties, as well as tourism tax or fees.

We urge for greater resource allocation for community groups and social enterprises that are dedicated to on-ground work which contributes to the goals and outcomes of the Biodiversity Strategy.

### Five system shifts

We are not confident that the proposed 'five system shifts' would enable us to achieve the goals and outcomes of the Strategy. It is crucial that the biodiversity sector or system is not working in isolation, because there are much bigger systems and forces at play that may contradict and undermine what we want to achieve.

The description of 'Shift 1: Getting the system right' does not seem to include any reference or consideration of other systems, notably the current economic system driven by extractivism and endless growth, and its components such as the minerals, petroleum, fishing, farming, forestry and tourism industries governed by other Ministries. The phrase 'a well-coordinated biodiversity system' is ambiguous and confusing.

Consider splitting the first shift into two:

- The first one could be "**An enabling environment for biodiversity**". This would encompass alignment of sectoral legislation, policies and resourcing, and agreements and collaboration amongst different ministries and agencies (including those with potentially conflicting interest) to minimise conflict and build an enabling environment for biodiversity conservation and restoration.
- The second one could be "**Collaborative biodiversity efforts achieved at local, regional and national levels**". It would encompass everything stated under 'Shift 1: Getting the system right' of the current proposal, as well as means of resourcing (both financial and human resources) to enable the implementation of the Strategy. It would benefit from more thoughts on supporting and engaging scientists and researchers who may be able to contribute to biodiversity knowledge and solutions.

### Shift 2: Empowering kaitiakitanga and mātauranga Māori

We support this proposed shift, in particular enabling and ensuring that tangata whenua hold key roles at all levels of biodiversity protection and restoration, including governance.

The crown should adhere to Te Tiriti O Waitangi and not the principles of the treaty which were written by the crown afterwards without iwi input. The crown should adhere to the settlement commitments at the very least but should go far and beyond that and honour Te Tiriti properly.

### Shift 3: Communities are empowered to take action

We support what's proposed in this section. Unfortunately, the current legal system and the way some councils operate and treat the public, are often major barriers to this shift. Community groups and individuals who are willing to make a stand and challenge councils and other government authorities on

their plans and decisions, for the sake of protecting the environment, should be supported (legally and financially), rather than be threatened with bankruptcy and made to carry legal costs<sup>7</sup>.

We agree that it is indeed important to develop economic tools such as an environmental consumption tax or environmental protection fund, contributed by polluters. However, these need to be designed properly so that the costs on polluters are not so low that they fail to deter any avoidance or reduction in pollution or other environmental harm.

We believe tourism, as it's being promoted strongly by central and regional governments, also needs to be planned carefully, bearing in mind environmental carrying capacity. Tourism should also contribute substantively to the maintenance, protection and restoration of biodiversity and natural assets. Such contribution may come in the form of finance and labour.

#### Shift 4: Connecting ecosystems from the mountain tops to the ocean depths

It is good to see the mention of *“corridors for nature, linkages over landscapes, reducing fragmentation... working strategically to fill in the gaps between ecosystems...”* and the role of productive landscapes in supporting indigenous biodiversity, in the proposal.

In terms of priority actions, we think the integration of biodiversity management into farm management should start immediately, rather than waiting for 3-4 years. In addition to traditional farm management focussing on livestock, other forms of farming incorporating food forests with a diverse range of tree crops, apiculture, grains, vegetables, fibre, medicinal plants and animals, also have good potential for biodiversity enhancement.

On the One Billion Trees programme, we do not support any increase in pine, Eucalyptus or other exotic species plantation, and urge that the programme be focussed on native species. There is potential for riparian planting to be part of this important programme, with benefits to biodiversity, water quality and climate.

Add *“Initiate a major review and strengthening of marine legislation to put restoring marine ecosystems and species at its centre”* as one of the priorities, preferably for immediate action.

#### Shift 5: Innovating for the future / Hiringa auaha anamata

It is good to see support for development of mātauranga research as one of the priority actions. We believe greater emphasis and support should be given for Māori communities to explore, collate, express and apply mātauranga concepts to biodiversity and ecosystem management.

Indeed, there is plenty of opportunities for ‘innovating for the future’ in terms of social innovation. Technological innovations are not always the answer.

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<sup>7</sup> <https://www.stuff.co.nz/taranaki-daily-news/news/77388539/taranaki-regional-council-files-bankruptcy-proceedings-against-friends-of-waitara-river>