



He Kura Koiora i hokia

Draft National Policy Statement for Indigenous Biodiversity

Response from the [Takaka Hill Biodiversity Group Trust \(THBGT\)](#)

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The Takaka Hill Biodiversity Group Trust comprises the landowners of Takaka Hill, in Tasman, residents together holding 3,000 hectares of land in varying stages of ecological development, from untouched native sub-alpine beech forest, to regenerating native forest, scrub and grassland.

It includes working farms, pine forestry plantations, a limestone quarry, and lifestyle blocks. These private lands offer a number of publically accessible recreational activities, including walking, cycling, caving, rock climbing, hang gliding and micro-light flight, with long-established pathways (The Old Coach Road, the Old Provincial Bridle Path, The QEII Takaka Hill Walkway,) kept open and accessible by landholders, as well as by DoC staff and the local Council.

The land mass is unusual in that it links two National Parks: the Abel Tasman and the Kahurangi. Landowners are acutely aware of the need to protect this land-bridge, a crossover point for native species - but also, potentially, a 'predator ark,' as Department of Conservation and associated groups (Project Janszoon, Forest and Bird, Birdsong Trust, Friends of the Flora,) work to eradicate pest species on public parks and reserves.

The Takaka Hill Biodiversity Group Trust runs its own programmes of predator trapping and eradication, working to manage feral goats, pigs, possums, stoats, and rats, as well as wasps, and invasive weeds such as banana passion fruit, old man's beard, gorse, blackberry, cotoneaster, Spanish heath and wilding pines.

In relation to the proposed Policy, we make the following observations.

Recognition of the landowner role

As a biodiversity group comprising private landowners and partnered local industries, we endorse the emphasis in this document on the recognition of the

landowner role in biodiversity conservation. This should be seen, we believe, not as an extension of public-lands management policies into private properties, but as a next-step and 'values shift' in recruiting all New Zealanders to biodiversity awareness and programmes of conservation, on 'their' lands - whether held by title, as in our case, or accessed periodically for recreational use.

Beyond biodiversity values to biodiversity management tools

We see this policy as moving beyond the broader 'values' emphasis of the 2019 Biodiversity Strategy document *Te Koiora o Te Koiora*, to begin providing some of 'the tools,' allowing practical projects and programmes of conservation work to proceed, in planned, collaborative, and integrated ways - over time.

Our main reservation here is the limited approach. With only the Resources Management Act (RMA) in focus, this document can only tweak existing frameworks. While it does this in useful ways - most notably the improved definitions and procedures for identifying Significant natural Areas (SNAs) and the strengthened provisions for introducing Te Ao principles as foundation for a Stewardship approach to biodiversity conservation - these will be slow to develop, and contested in their case-by-case application.

Since, like all biodiversity documents, this one begins by stressing the urgency of the work, and the need for a holistic 'complex ecology' approach, this continued focus on 'special pleading' is disappointing. SNAs and Taonga species provisions maintain an old-school 'fence to conserve' way of working, at a moment when biodiversity conservation is rapidly becoming a universal matter of concern to all citizens, and is recognised as subtly enmeshed in all aspects of human life, well-being and activity.

We fear that this policy too, while useful in small-scale ways, may be missing its moment in relation to its potential to lead us forward.

Positive aspects of the proposed policy

Provisions for biodiversity restoration and enhancement

The policy explicitly endorses a focus on areas no longer pristine. It allows for remediation of already-depleted or predated zones, and considers the likely need to mitigate climate change impacts.

This is pragmatic, and crucial in working to extend the 'natural range' of native species. So too is recognition of the need to establish 'buffer' zones around SNAs, and the need to manage land outside recognised protection zones.

This is important for terrain such as our own on the Takaka Hill: karst country, with regenerating native vegetation, and break-out rare native fauna, currently

re-colonising from conservation programmes in contiguous National Parks (including kiwi, kea, kaka, kakariki, whio, pateke.)

The policy needs to recognise the consequences of this step forward into an integrationist vision and set of procedures. It has the potential to give biodiversity conservation work, through its embrace of a Te Ao ethos, a cohesive 'stewardship' philosophy, which all groups can endorse.

Beyond this, however, lies the policy's emphasis on 'tools' for conservancy - and here the progress forward is more limited. With the exception of the Section A (c) 'stepping out' of how to manage Adverse Effects, and the useful listing in Appendices of ways of assessing the indigenous biodiversity values of a given ecosystem, the RMA remains limited in how it can help 'manage' biodiversity.

One step forward, many steps back

Previous policies have been, as the document notes, 'not comprehensive, robust or totally aligned' (p. 9.) The relegation of what is national policy to a regional implementation has left too many gaps and variations at the level of interpretation and implementation. Our experience suggests too that Local Government has been under-resourced and under-skilled in relation to managing the environment through the RMA, and has prioritised other values and projects, more in line with its traditional roles.

This is, at least, now recognised - although there remain shortcomings in relation to 'robust' protections for biodiversity. It is easy to see nervousness remaining within the policy in relation to, for instance, the Section A (c) 'Adverse effects' provisions, where the 'stepped' sequencing of possible responses to environmental impacts could produce a reversion to a 'bottom line' approach. With few resources available for monitoring regional applications of the new policy, and reporting and evaluation always likely, by their nature, to be delayed, protection of Significant Natural Areas may well come too late.

This is especially so when the complexity of ecological formations, crossing property boundaries, or impacted upon by irregular 'irruptive' features such as waterway floods, seeding or mast-year events, can impact unexpectedly, and from outside the protected areas themselves. It is 'not the job' - or not *yet* the job - of Local Government officers as they assess a development plan or change-of-use proposal under the RMA, to go outside their remit, and so the 'stewardship' and 'complex ecology' visions of this and related policy changes will be lost.

Building a 'connective' approach into 'the toolkit'

There is useful recognition in the policy document of the need to consider occupancy across a species' natural range, with issues of connectivity and 'buffering' considered. These are first steps towards broadening into a 'complex ecology' approach and a more holistic overview, which can consider the 'downstream' consequences of actions undertaken after land-use decisions.

It is still, however, limited to a view of 'protective zones' - simply drawing them a little further out.

What is needed instead, is recognition that ecology itself sees only a space of flows. Nature does not recognise our land boundaries.

The policy - by its own admission - is limited by its own origins in land development planning. It concedes, for instance, its terrestrial focus, and its failure to engage with the crucial matter of water conservancy, especially when wetland species and marine ecosystems are at most risk. But fail in water management, and you fail completely.

So too the policy's recognition of urgency arising from climate change. This is likely to pressure matters under the RMA's planning provisions. Coastal retreat after tidal rise is likely, for instance, to increase demand for housing and production on lands previously considered 'difficult' or 'marginal.' Likewise, biodiversity is becoming a major national perspective, and especially its connection to social-ecological principles of human well-being. This will increase recreational use of 'wilderness' areas - from both local populations and tourists. Areas such as the Takaka Hill are considered as some sort of mystic 'wilderness,' yet are still a complex and under-researched ecology. They may be 'wild,' yet remain only 20 minutes from urban communities. They can too easily be thought 'already protected' by National Parks and Reserves, and will be under increasing pressure.

An adaptive biodiversity 'toolkit'

How robust will RMA provisions prove, even as streamlined and tightened within this policy, in the protection and enhancement of biodiversity?

While the steps taken here help see private lands as part of the biodiversity picture, and provide for ways of registering their existing and future uses within biodiversity values, these are still limited proposals.

They must not be allowed to stand as 'the solution.' Otherwise, they risk scoring as 'failure,' delivering no more than very small fragments of a solution. Their efficacy risks being over-balanced by the otherwise detailed and precise provisions for forcing RMA compliance, in the name of indigenous biodiversity, on private landowners.

Our recommendation is that policy such as this need to allow time for a new 'integrationism' to emerge.

While the need for indigenous biodiversity protective legislation is indeed urgent, legislative reform itself re-forms cultural understandings and values, and so alters actions. The policy needs to be aware of its own developmental and adaptive trajectory, alongside wider policies re-framings, such as the values work undertaken in *Te Koiroa o Te Koiroa*.

As it stands, it is only one tool in the toolkit - and needs to acknowledge that. As its provisions are trialed, they will need to undergo constant tests of their utility and suitability.