



## **Takaka Hill Biodiversity Group Trust**

### **Response to Tasman District Council Biodiversity/Biosecurity Discussion Document, 2020**

#### **Q1 Vision of the state of Biodiversity in Tasman region in 2050**

*October, 2050*

*Tasman residents prepare for the Spring season of habitat maintenance work, before the Summer food production and visitor season begins.*

*Businesses discuss this year's biodiversity off-set targets, and their allocation of staff work-hours to their in-house biodiversity-enhancement projects.*

*Managers review their annual data on biosecurity protection measures undertaken in 2050. They watch the NIWA climate alerts projections for 2051, and draw up details of their planned response, to send to TDC for the annual Regional Biodiversity Community plan.*

*They pay special attention to the all-important 'School Report': the section where they must address their biodiversity/biosecurity projections for the next decade. They answer incisive and well-informed questions from their future residents, workers and consumers, prepared as part of the school 'Citizenship' curriculum, about their business and its current uses of the natural world. They are required to show how any changes planned will prioritise biodiversity conservation and environmental health into coming decades, and improve the security of productive lands and waterways.*

*Meanwhile, regional residents are preparing their rates statements for 2050-51. They must report on biodiversity/biosecurity projects completed from their allocation of the 'Environment Rebate' in the last year, and enter hours of volunteer biodiversity work undertaken by members of their household - or they can choose to pay full rates, with that contribution re-applied to support householders who are elderly or disabled. Some residential 'Bio-precincts' with special biodiversity/biosecurity issues work together to represent the needs of their precinct for a larger-scale Biodiversity Project Grant.*

*It's an election year. Both the Biodiversity Minister and the Regional Communities Minister will have to deliver a detailed Bio-State of the Nation report to all citizens. TDC Senior Managers will be questioned beside them in public meetings, as they move through the Region. Meetings, live-streamed, are watched by many citizens, and an auto-feed selects related questions and proposals drawn from other regions, to help keep up to date with innovative ideas. A 'best of' presentation is edited to send out globally in a bio-creativity exchange with other nations.*

*With climate change impacts and extreme weather events hitting hard, and New Zealand food and potable water production highly sought-after in world markets, the pressure on the natural environment is heavier than ever. The sorts of universal bio-stewardship now undertaken at every level of modern life, is still only just keeping up... 'The School report' is already pressing for more, and better, biodiversity protections...*

### **Q2/3 Well-managed habitat; three 'important places'**

These questions alone suggest that TDC is caught in an ecological time-warp: that it sees biodiversity as about 'projects,' and 'small parks,' or 'well-managed properties.' It sees some places as 'more important' than others - despite the problems such vision has caused in the past.

'Well managed habitat' and 'important places' do exist - but they exist only in their own location. They are specific to it. You can waste a lot of time admiring them - because they cannot simply be replicated, somewhere else. Nor will their 'management model' apply, without extensive adaptation, to other habitat.

Biodiversity isn't about one-size-fits-all. It is not possible, or desirable, for any single model to be lifted away from its context and applied somewhere else.

Biodiversity tailors to its locale - that's why it is called biodiversity. It indicates that nature is, by definition, about adaptation and difference. Habitats and species adapt - and a regional management body such as TDC must also confront this perspective. Standardisation, or funneling biodiversity project work through single-model management platforms, restricts what is possible, and so repeats the problems already caused by our exploitation of the natural environment.

Biodiversity must be considered holistically, or else it undermines its own principles.

### **Q4 Important threats to biodiversity in Tasman**

4.1 The major threat is lack of a coherent biodiversity/biosecurity policy, and especially one which is not sustained through time, because it is not fully 'owned' by TDC itself, to the extent of informing all its policies and practices, across all its service delivery operations. Biodiversity as a value and TDC's policy as a guiding

principle and a set of practices and processes must be accepted and followed by all Tasman residents, businesses and landholders, who feel assured that such policies will remain stable, across these and following decades.

4.2 The second threat also relates to policy failure.

The current discussion document delivers a flawed vision, offering only small-scale, 'project based' biodiversity 'remediation,' without any understanding that all biological systems are linked, and that 'protection' of this or that species, or this small pocket of native bush, guarantees nothing.

Worse: it sets all projects into competition with one another, as if one were somehow 'more urgent' than others, or one species 'more valuable.'

Related to this is the degree to which community volunteers doing biodiversity 'project' work - declining in number with the aging of baby-boomer pro-environment cohorts and the 'lean years' multiple-employment of the post-COVID workforce - are wasting time which could go directly to environmental work, on writing grant applications and reports to funding bodies - not least to TDC, which risks creating a mini-bureaucracy in the biodiversity zone.

While data and reporting are important and necessary, they need to be streamlined, part of an everyday for all, and available on open, self-entered electronic data bases. The 'dashboard' of achievements and concerns should not be a tool of senior management, but a public display for all citizens to review - in turn, driving their sense of what is urgent, and how they might contribute.

4.3 The final threat relates to the absence in the discussion document as proposed, of any address of the implementation phase of a biodiversity/biosecurity strategy. Without considering those matters up-front, it is impossible to see how biodiversity/biosecurity will actually become part of TDC's governance remit.

How will TDC itself position biodiversity/biosecurity planning and action, inside its own day-to-day operations?

What will it mean for Building Inspectors? Permit Applications for recreational users of public spaces? Refuse Collection contractors?

What sorts of institutional cultural change will be required, to place biodiversity/biosecurity values at the core of all operations, to see them prioritised by all elected officers, and to make them part of all Council reporting practices?

How will these sorts of cultural change be integrated into Council staff and elected officer training?

Only once those questions are considered, will the size and scope of a policy on biodiversity/biosecurity become clear. Fail to ask those questions, and the policy, no matter how noble in its intent, remains inert.

## **Q5 Barriers to biodiversity/biosecurity**

The major uncertainty in the area of biodiversity/biosecurity planning is the collapse of the current RMA - under which this policy process was begun.

To that extent, it is laudable that TDC is continuing its policy development - however, some degree of transparency is required during public/community consultation, in relation to how TDC views likely outcomes as the RMA is re-worked - especially under post-COVID conditions. Without a strong, and clear, view on this, Tasman risks abandonment of all biodiversity/biosecurity gains, confronted by collapsed or suspended environmental review, as infrastructure projects, 'shovel-ready' work relief, and fast-track development applications push forward.

Community Consultation needs to be upfront about this, and include consideration of the *Strategic Planning Act* and its principle of 'Spatial Planning', with urban, agricultural and industrial 'zones,' and the *Natural and Built Environments Act*, considering urban development, and urban, rural and marine environments.

In the current absence of clear consensus around how these sorts of development and regional special zoning will occur, it makes little sense to collect a list of 'special places' for biodiversity - TDC's current approach in relation to community consultation. Quite simply, these 'special places' may not prove to be special at all, once other criteria are in play. Further: since the larger-scale 'zoning' of the new Acts is likely to prevail, why not consider it now, and ask Tasman communities to consider whether it might endanger biodiversity gains?

There are three ways forward.

- 1 Consider broad zones of development, as Nelson City Council is doing, albeit with a much smaller landmass. This will move us beyond the problematic 'patchwork' approach of old-school 'enclosure' environmental 'protectionism,' and into a more holistic style of planning and environmental management.
- 2 Consider the two heirs to the RMA currently proposed. Together, these give us clues to what may emerge - and so how to array biodiversity values and practices into a future management regime.
- 3 Acknowledge the reality of Tasman as a region: one far more heavily occupied than most by National Parks, and with key horticultural, forestry and fisheries roles to protect.

Tasman's discussion does not need to be about 'What is biodiversity and why is it important?' These are debates which are largely now over, and which have achieved broad consensus - including within primary industry, where environmental planning is integrated into many of their operations.

Instead, biodiversity/biosecurity debate should now be around which zones are crucial to primary production, which to recreation, which to urban/semi-urban business, and which to residency.

There is far too little discussion in this document about biosecurity: the preservation of productive land and water resources. Until policy acknowledges the importance of this, and sets policy to ensure a pro-biodiversity best-practice operation, the usual piece-meal 'solutions' will be all that can be achieved.

Finally, but crucially, the policy says nothing about how the values espoused in the document are to be promulgated to all; made flexible as new demands or crises emerge; kept consultative, so that all are involved in decision making, and are arrayed across all TDC operations.

There is no mention of the degree to which data, now so readily generated from all regional activities, can be used to analyse progress towards biodiversity protection.

There is no way of linking biodiversity understandings into education of future Tasman citizens, or into recreational activities using the natural environment, or how to connect biodiversity work with new forms of voluntarism.

The 'barriers,' in other words, all relate to the limited vision achieved to date in the policy.

## **Q6 Habitats, species or populations in need of care**

The suggestion that habitat or species should be singled out in such ways betrays weakness at the understanding of biodiversity in the proposed policy. We are not running a zoo. 'Enclosure' as a core of conservation is at best a tactic, not an overall strategy. To consider it as if it were the major direction of a biodiversity/biosecurity practice is to misunderstand and misrepresent what biodiversity is. It is old-school thinking, and defeats the central ecological principles of inter-connectedness: the systems approach of true conservation.

Put simply, all of Tasman's habitat and species are in need of care.

Declaring a few more 'reserves,' or zoning lands for this or for that 'special consideration,' ignores history. We know that areas now considered crucial to overall ecological health and to food-harvesting activities - such as estuarine wetlands, for instance; were once considered 'mudflats' and filled in whenever

possible. The term 'scrub' tells us much of what flatland native foliage, shrubs and grasses, were considered to be 'for.'

Biodiversity recognises that all species: economically viable or not; aesthetically pleasing or not; occupy a position in the natural environment, and maintain its health.

### **Q7 Successful Biodiversity projects that could be scaled up.**

Here too the discussion document and the question miss the mark.

This suggests 'quick fix,' 'box-tick' solutions. What matters here is not projects, but values and the 'impact' monitoring of practices - those of TDC itself, and of residents, businesses and landholders.

These are matters that cannot be 'scaled up'.

What TDC needs is to acknowledge its own role, as source of over-arching pro-biodiversity values statements, around which community, industry, and small businesses cluster their assessments of the downstream impact of their activities, and so can plan their mitigation.

TDC should not see itself as the Biodiversity Lotteries Commission, handing out project goodies to this year's winners from the large basket of similar local projects - and disappointing all the others. Instead, it needs to have biodiversity written in to all its policies and monitoring/regulatory practices - so that all Tasman activities centre, as a priority, on biodiversity protection and enhancement.

That alone is enough to handle - especially in the coming decades of climate change, coastal inundation, water shortages, and a governance system close to the limits of its taxation/rating take.

Only if/when biodiversity becomes recognised as a 'common good' - a first principle of kaitiakitanga for all subsequent activities, as is the practice within Te Ao Maori, will change begin. And that change is urgent.

### **Q8 Four principles for a biodiversity/biosecurity policy for Tasman**

Biodiversity policy needs to build around

- 8.1 Te Ao Maori values, as First Nation guardians of the natural world, with highly developed understandings of how the whole system links human health to environmental health.
- 8.2 DoC policy, since DOC manages the bulk of Tasman Lands, and itself has a biodiversity policy integrated in ways the TDC plan has failed to achieve.

Consider DOC's phrase: 'From the mountains to the sea.'

It captures Tasman's ecology perfectly. It is memorable, and it provides a platform for local biodiversity work and planning, onto which everyone can project.

So what is TDC's slogan? What is 'brand bio-Tasman?'

How could we build something equally compelling, that defines us as a bio-secure and bio-diverse world, unwilling to compromise on our natural environment?

### **8.3 TDC's own active role in biodiversity/biosecurity management**

TDC's role is to manage two things: *habitation*, and *production*.

It is these activities that need a new biodiversity/biosecurity emphasis.

Biodiversity policy needs a section which considers and outlines how every one of TDC's regulatory roles is impacted upon by biodiversity and biosecurity principles.

Without such a section, 'the community' cannot see a Council with any true commitment to these ideals. Nor can it see clear pathways to the sorts of community work and self-management of their own lands and/or recreation in public spaces, which admit biodiversity values and consider biodiversity outcomes. What is the value of biodiversity work, if TDC practices fail to consider the downstream consequences of other forms of use and/or development? Where are the guarantees, in TDC's own response and planning for biodiversity, that such consequences will always be considered?

### **8.4 Communicating biodiversity/biosecurity values and practices**

Finally, the policy must address how to communicate these values, by word, by image, and by action.

It must project these values and associated practices outwards, to mark Tasman as a pro-biodiversity region, and to show that at work.

Finally, it must commit to these principles and practices across time, with procedures and operational planning in place, to track progress towards preserving and restoring what makes us distinctive.