

Your submission to Proposed National Policy Statement for Indigenous Biodiversity

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Reference no: 23

Submitter Type: NGO / professional body

Overall Position: Support

Clause

Overall thoughts about the introduction section and the need for an NPSIB:

Notes

The need for a NPSIB is endorsed by the OSNZ because it will express a clear, realistic and comprehensive vision on this topic, how this vision can be achieved and the long-term benefits to New Zealand of effectively managed indigenous biological diversity.

Clause

Question 1: Do you agree a NPSIB is needed to strengthen requirements for protecting our native plants, animals and ecosystems under the Resource Management Act 1991 (RMA)? Why/why not?

Position

Yes

Notes

A NPSIB provides a strong basis for developing coordinated guidance for planning and subsequently managing populations of indigenous plant and animal species across their natural range and on all land tenures, and for planning and managing the functions, resilience and adaptability of ecosystems.

Clause

Question 2: The scope of the proposed NPSIB focuses on the terrestrial environment and the restoration and enhancement of wetlands. Do you think there is a role for the NPSIB within coastal marine and freshwater environments? Why/why not?

Position

Yes

Notes

A NPSIB should have a role within coastal marine and freshwater environments as well as in the terrestrial environment. Numerous indigenous bird species having conservation threat classifications are naturally adapted to occupying coastal marine and/or freshwater environments as well as terrestrial environments and accordingly an all-inclusive approach is desirable in habitat management for such bird species. Notable examples are black shag/kawau, wrybill/ngutuparore, black-billed gull/tarāpuka, and yellow-eyed penguin/hoiho.

Clause

Question 3: Do you agree with the objectives of the proposed NPSIB? (see Part 2.1 of the proposed NPSIB) Why/why not?

Position

Yes

Notes

The objectives are realistic, meaningful and given appropriate resourcing will be achievable over time.

Clause

Question 10: Territorial authorities will need to identify, map and schedule Significant Natural Areas (SNAs) in partnership with tangata whenua, landowners and communities. What logistical issues do you see with mapping SNAs, and what has been limiting this mapping from happening?

Notes

Identification and mapping Significant Natural Areas in respect of indigenous bird species and habitats will require detailed knowledge of their occurrence and habitats. A third iteration of the national bird atlas project, designed and being led by The Ornithological Society of NZ, was initiated in 2019. This will provide detailed information about the occurrence and abundance of birds that will be helpful for identifying and subsequently planning and managing Significant Natural Areas in respect of indigenous birds.

Clause

Question 11: Of the following three options, who do you think should be responsible for identifying, mapping and scheduling SNAs? Why?

Position

Regional Councils

Notes

In respect of indigenous birds and their habitats, a broad geographic perspective is necessary for identifying, managing and scheduling of Significant Natural Areas and accordingly the regional councils should have responsibility for these functions.

Clause

Question 12: Do you consider the ecological significance criteria in Appendix 1 of the proposed NPSIB appropriate for identifying SNAs? Why/why not?

Position

Yes

Notes

From the viewpoint of criteria for identifying significant habitat for indigenous birds the "ecological significance criteria" described in Appendix 1 of the proposed NPSIB are scientifically sound, comprehensive and balanced, and are endorsed by the OSNZ.

Clause

Question 13: Do you agree with the principles and approaches territorial authorities must consider when identifying and mapping SNAs? (see part 3.8(2) of the proposed NPSIB) Why/why not?

Position

Yes

Notes

The principles and approaches (set out in para 3.8 of the proposed NPSIB) that territorial authorities must consider seem to be balanced, comprehensive, achievable and are fair.

Clause

Question 14: The NPSIB proposes SNAs are scheduled in a district plan. Which of the following council plans should include SNA schedules? Why?

Position

Combination

Notes

A combination of a regional policy statement, regional plan and district plan is preferable because this approach has the potential to provide effective coordination and a stronger basis for cooperation and implementation than do the alternatives.

Clause

Question 15: We have proposed a timeframe of five years for the identification and mapping of SNAs and six years for scheduling SNAs in a district plan. Is this reasonable? What do you think is a reasonable timeframe and why?

Position

Yes

Notes

The proposed timeframes are reasonable. Although a national bird mapping atlas that commenced in 2019 (see Q10) is intended to run for five years, during this time an increasing amount of accurate and precise data on bird occurrence and abundance will be progressively be accumulated in a publically accessible online database, and can be used for species and habitat planning and for management purposes.

Clause

Question 17: Part 3.15 of the proposed NPSIB requires regional councils and territorial authorities to work together to identify and manage highly mobile fauna outside of SNAs. Do you agree with this approach? Why/why not?

Position

Yes

Notes

The OSNZ strongly endorses a requirement in the NPSIB for regional and territorial authorities to work together to identify and manage highly mobile fauna outside of Significant Natural Areas. In time, the results of the OSNZ designed and led national bird atlas project will provide comprehensive information that will enable Councils, the Department of Conservation and other agencies to cooperate for managing populations of highly mobile bird species. Examples of highly mobile indigenous birds, also having a "Threatened" conservation threat classification are NZ mountain parrot/kea, yellow-eyed penguin/hoiho, white heron/kotuku and black-fronted tern/tarapiroe. Some highly mobile indigenous bird species are well established or are becoming established in suburban localities, for example, tūi and kākā in Wellington.

Clause

Question 18: What specific information, support or resources would help you implement the provisions in this section? (Section B)

Notes

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suburban localities, for example, tūi and kākā in Wellington.

Clause

Question 25: Do you agree with the proposed approach to managing significant indigenous biodiversity within plantation forests, including that the specific management responses are dealt with in the National Environmental Standards for Plantation Forestry? (see Part 3.10 of the NPSIB) Why/why not?

Position

Yes

Notes

This proposal is positive and realistic. Plantation forests provide habitat where several indigenous bird species can feed and breed throughout the year, for example, NZ robin/toutouwai and NZ fantail/piwakawaka.

Clause

Question 27: Does the proposed NPSIB provide the appropriate level of protection for indigenous biodiversity outside SNAs, with enough flexibility to allow other community outcomes to be met? Why/why not?

Position

Yes

Notes

The proposed approach is balanced, realistic and achievable.

Clause

Question 28: Do you think it is appropriate to consider both biodiversity offsets and biodiversity compensation (instead of considering them sequentially) for managing adverse effects on indigenous biodiversity outside of SNAs? Why/why not?

Position

Yes

Notes

A sensible proposal endorsed by the OSNZ. Where it is in the regional or national interest to do so the aim should be to ensure that landowners are properly compensated through biodiversity offsetting and/or biodiversity compensation arrangements for managing adverse effects on indigenous biodiversity that are already known or are discovered on their land.

Clause

Question 30: Part 3.5 of the proposed NPSIB requires territorial authorities and regional councils to promote the resilience of indigenous biodiversity to climate change. Do you agree with this provision? Why/why not?

Position

Yes

Notes

It is acknowledged that, as expressed in the Discussion Document, the “impacts of climate change on indigenous biodiversity are complex and often highly uncertain, meaning that planning for them can be difficult. This is often compounded by a lack of data on climate change impacts in different regions.” The results of the OSNZ designed and led national bird atlas project will, over time, provide comprehensive information on bird occurrence and abundance that will enable Councils and other agencies to “promote the resilience of indigenous biodiversity to climate change”. See also Q15, Q17 and Q18.

Clause

Question 31: Do you think the inclusion of the precautionary approach in the proposed NPSIB is appropriate? (see Part 3.6 of the proposed NPSIB) Why/why not?

Position

Yes

Notes

This approach is prudent and sensible when there is uncertainty about trends in biodiversity that imposes difficulties for both planning and management, especially in respect of bird species having high conservation threat rankings.

Clause

Question 38: The proposed NPSIB promotes the restoration and enhancement of three priority areas: degraded SNAs; areas that provide important connectivity or buffering functions; and wetlands. (See Part 3.16 of the proposed NPSIB). Do you agree with these priorities? Why/why not?

Position

Yes

Notes

This approach is both realistic and practical. The results of the OSNZ designed and led national bird atlas project, together with existing published knowledge, will provide comprehensive information that will enable various agencies to better plan and manage the restoration of degraded wetlands and the formation of buffer zones that will, over time, provide more secure environments for many indigenous bird species. Bird species that are expected to benefit from these initiatives include red-crowned parakeet/kakariki and bellbird/korimako.

Clause

Question 41: Do you think regional biodiversity strategies should be required under the proposed NPSIB or promoted under the New Zealand Biodiversity Strategy? Please explain

Notes

The development and public acceptance of regional biodiversity strategies based on sound ecological science that will lead to effective management of bird habitats and sustainable populations of a diversity of indigenous bird species is both sensible and desirable.

Clause

Question 42: Do you agree with the proposed principles for regional biodiversity strategies set out in Appendix 5 of the proposed NPSIB? Why/why not?

Position

Yes

Notes

The principles expressed in Appendix 5 are realistic in respect of indigenous bird species.

Clause

Question 45: What specific information, support or resources would help you implement the provisions in this section? (Section D)

Notes

The Ornithological Society of NZ designed and led national bird atlas project that is currently underway, together with existing published knowledge, will provide specific information that can contribute to the formulation of regional biodiversity strategies at least in respect of birds.

Clause

Question 46: Do you agree with the requirement for regional councils to develop a monitoring plan for indigenous biodiversity in its region and each of its districts, including requirements for what this monitoring plan should contain? (see Part 3.20 of the proposed NPSIB) Why/why not?

Position

Yes

Notes

As explained in the Discussion Document (p77), monitoring is essential for measuring the success of policy (implementation). This is no less true in respect of birds as it is with other biota. Monitoring plans to be developed by Councils could include a requirement that the Ornithological Society of NZ designed and led national bird atlas methodology be adopted and extended to monitor bird occurrence and abundance beyond the 2019-2024 atlas period.

Clause

Question 48: Do you agree with the proposed additional information requirements within Assessments of Environmental Effects (AEES) for activities that impact on indigenous biodiversity? (see Part 3.19 of the proposed NPSIB) Why/why not?

Position

Yes

Notes

The Ornithological Society of NZ designed and led national bird atlas, together with existing published knowledge, can contribute information that may be considered by Councils when assessing the environmental effects of activities on indigenous birds.

Clause

Question 54: If the proposed NPSIB is implemented, then two pieces of National Direction – the New Zealand Coastal Policy Statement (NZCPS) and NPSIB – would apply in the landward-coastal environment. Part 1.6 of the proposed NPSIB states that if there is a conflict between instruments the NZCPS prevails. Do you think the proposals in the NPSIB are clear enough for regional councils and territorial authorities to adequately identify and protect SNAs in the landward coastal environment? Why/why not?

Position

Yes

Notes

As indicated in Q2, a NPSIB should have a role within coastal marine environment. Numerous indigenous birds, including species having a 'threatened' conservation classification, are ecologically adapted to occupying the coastal marine environment and need to be considered in biodiversity conservation policy and planning. Examples are Caspian tern/taranui and banded dotterel/tūturiwhatu (both species also occur inland).