

## Feedback by

# Hamilton City Council Staff

## Te Koiora o te Koiora – A Discussion Document on a Proposal for a Biodiversity Strategy for Aotearoa New Zealand

20 September 2019

It should be noted that the following feedback is from staff at Hamilton City Council and does not necessarily represent the views of the Council itself.

### 1.0 INTRODUCTION

- 1.1 Hamilton City Council staff ('staff') welcome the opportunity to provide feedback to Te Koiora o te Koiora – A Discussion Document on a Proposal for a Biodiversity Strategy for Aotearoa New Zealand ('the discussion document').
- 1.2 Staff have developed this feedback by referring to Council's existing policies and strategies which relate to biodiversity.

### 2.0 FEEDBACK STRUCTURE

- 2.1 The staff feedback is structured under the following section headings:
  - 1.0 Introduction
  - 2.0 Feedback Structure
  - 3.0 General Comments
  - 4.0 Feedback on the Discussion Document's Questions
  - 5.0 Further Information

### 3.0 GENERAL COMMENTS

- 3.1 Staff recognise the important contribution that volunteers, private landowners and Iwi/Maori make to biodiversity restoration within Aotearoa/New Zealand. However, staff are of the view that, in order to achieve the vision and long-term outcomes outlined in the discussion document, adequate resourcing is required at all levels of the system.
- 3.2 The level of investment and resourcing should be commensurate with the importance of biodiversity to our economy and is required at all levels of the system. The level of investment should recognise that two of the country's biggest export earners – tourism and primary production – rely on the ecosystem services which thriving biodiversity provides. Such resourcing would recognise the contribution that the ecosystem services provide to economic prosperity in Aotearoa/New Zealand.
- 3.3 Staff are of the view that there is a weak connection between biodiversity management and 'non-environmental' aspects of biodiversity (including housing, transportation and other economic activities) in the discussion document. Due to this, staff consider that the biodiversity strategy (and associated implementation actions) will be limited in its ability to positively impact on biodiversity in

Aotearoa/New Zealand. Staff suggest that Department of Conservation take a ‘whole of government’ approach and proactively engage with the relevant ministries and departments to create a collaborative strategy which recognises the interdependencies between biodiversity, land use, urban development and transportation.

#### **4.0 FEEDBACK ON THE DISCUSSION DOCUMENT’S QUESTIONS**

- 4.1 Staff recognise that the feedback will be used to further shape the new biodiversity strategy. Not all questions posed in the discussion document have been answered as staff have focused on those issues which are deemed to be of most relevance.
- 4.2 ***Question 1 in the discussion document: How well does Part 1 of the discussion document set out the problem and consider the challenges and opportunities facing nature now and in the future?***
- 4.3 Staff are of the view that, despite objectives, policies and methods within district plans which relate to biodiversity protection, biodiversity protection and restoration is not adequately provided for in the current model of urban development. To date, this has resulted in a decline in biodiversity within urban areas. Staff are concerned that the continual expansion of the footprint of urban areas (utilising existing models of urban development) is not highlighted as a key pressure on biodiversity (page 14 of the discussion document).
- 4.4 Should urban limits continue to be renegotiated and expanded, there is a risk that biodiversity will continue to be negatively impacted. Staff therefore suggest that greater emphasis is put on ensuring that development is undertaken in such a way that restores biodiversity within urban areas.
- 4.5 Staff agree that *“Our decision-making and economic systems often fail to account for the value of nature”* (page 16 of the discussion document). It is hoped that the Living Standards Framework will go some way to addressing this as we seek to measure our progress as a nation more holistically in terms of human, social, natural and financial/physical capitals. Additionally, staff are supportive of financial incentives which seek to address the private cost of biodiversity protection and restoration borne by landowners, despite such actions contributing towards a public good.
- 4.6 As highlighted in Section 3.2 of this feedback, staff consider that there is lack of connection between the new biodiversity strategy and the important role which other central government ministries and departments can make in achieving the strategy’s vision and long-term outcomes. Given that land use and pollution are listed as two of the key pressures on biodiversity (page 14 of the discussion document), taking a ‘whole of government’ approach and collaborating with government agencies who are responsible for economic development and activity (of which land use is a central component) is vital.
- 4.7 Staff therefore suggest that the new biodiversity strategy needs to be developed in collaboration with key government agencies such as the Ministry of Business, Innovation and Employment (which includes tourism); the Ministry of Housing and Urban Development; and the New Zealand Transport Agency. This would ensure that protecting and restoring biodiversity is a ‘whole of government’ priority. To this effect, staff consider that the ministries listed previously are identified as key government agencies in the final biodiversity strategy.
- 4.8 ***Question 2: What do you think of the proposed strategy framework? Does it provide a useful way of linking the elements of the strategy together?***
- 4.9 As outlined in Section 3.1, adequate resourcing (funding, expertise and information, staff resourcing for regulatory enforcement) is required to improve biodiversity in Aotearoa/New Zealand. To this end, staff suggest that the first outcome area – ‘empower’ – is amended to be ‘enable’ or ‘resource’ (and an appropriate Maaori term). Making this change to the outcome area (and the associated commentary on the long-term outcomes on page 31 of the discussion document and five system shifts to support change on pages 36-59) would ensure that appropriate resourcing is made available for communities to exercise their role as kaitiaki or guardians for biodiversity in Aotearoa/New

Zealand.

- 4.10 Staff are supportive of the poutama framework. However, staff suggest that the eight values identified underneath the outcome areas have an English translation in order to account for people who may have an emerging understanding of Te Reo Maaori.
- 4.11 **Question 3: What do you think of the proposed vision for Aotearoa New Zealand and its timeframe?**
- 4.12 In general, staff support the proposed vision. In particular, staff support the vision as it recognises the importance of nature to human existence, and that we have a responsibility to ensure we are stewards of nature. However, in order to ensure that appropriate resourcing is made available to improve biodiversity, staff suggest the following wording change to the vision (as shown in underline): *“Nature in Aotearoa is healthy, abundant, and thriving. Current and future generations connect with nature, place value on it, restore it and are restored by it”*.
- 4.13 This additional phrase would allow for a greater line of sight (from the vision to the implementation actions) to ensure that adequate funding is made available for biodiversity protection and restoration. It would also reinforce the value that ecosystem services provide across a range of social, economic, cultural and environmental domains.
- 4.14 **Question 5: What do you think about the proposed long-term outcomes? Is there anything you would add or change?**
- 4.15 As outlined in section 4.8 above, staff suggest that the ‘whakahou/empower’ long-term outcome is amended to ‘enable’ or ‘resource’. This resourcing would ideally come in the form of funding for physical works, additional staff at a territorial authority level who have expertise in local knowledge of ecological restoration and resourcing of coordination and project management. Additionally, staff would like to see adequate resourcing for tangata whenua to exercise their role as kaitiaki. Staff also support the removal of barriers which impact negatively on the ability of tangata whenua to exercise their role as kaitiaki.
- 4.16 The ‘waananga/systems and behaviour’ long-term outcome discusses the connection between the economy and biodiversity. Staff support this outcome and would like to see this strengthened by ensuring that any economic activity is responsible for ensuring that it does not impact negatively on biodiversity. Given this, support may be needed for some activities to transition their business practices to ensure the ecosystem services they use are not negatively impacted on.
- 4.17 **Question 9: What do you think about the five system shifts? Are they the right areas to focus on in the near term? Are there other areas that should be included?**
- 4.18 Staff are supportive of the five system shifts outlined in the discussion document. In particular, the recognition of the importance of managing ecosystems in a connected and holistic way gives greater mandate for local government staff to work across jurisdictional boundaries.
- 4.19 As mentioned in Section 3.2 and 4.6, staff suggest that communities are ‘enabled’ or ‘resourced’ to take action. Given this, Shift 3 (‘Communities are empowered to take action’) is particularly important. Many communities already know that biodiversity protection and restoration is important, but do not have adequate resourcing to deliver this work on the ground.
- 4.20 Staff support the acknowledgement that there is a connection between economic prosperity and biodiversity protection. Recognising that there is an economic value and benefit of protecting and restoring biodiversity (and conversely, a cost of degrading biodiversity) and embedding this in our economic systems, is vital.
- 4.21 Staff support incentivising nature protection and biodiversity restoration. Staff would like to see the new biodiversity strategy (and associated commitment to resourcing) to include financial incentives such as greater QEII covenanting support, rates relief for land which is retired from traditional use for biodiversity restoration and funding for fencing, planting and pest control.

## 5.0 FURTHER INFORMATION

- 5.1 Should the Department of Conservation require clarification of the above points, or additional information, please contact Amanda Banks (Policy and Strategy Advisor) on 07 958 5806, email [amanda.banks@hcc.govt.nz](mailto:amanda.banks@hcc.govt.nz) in the first instance.

Yours faithfully



**Richard Briggs**  
**CHIEF EXECUTIVE**