



Hamilton City Council – Staff Submission

Action for Nature – Implementing New Zealand's Biodiversity Strategy 2025–2030 (May 2025 Discussion Document)

Department of Conservation

30 June 2025

Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- **A city that's easy to live in**
- **A city where our people thrive**
- **A central city where our people love to be**
- **A fun city with lots to do**
- **A green city**

The topic of this staff submission is aligned with all of Hamilton City Council's five priorities.

Council Approval and Reference

This staff submission was approved by Hamilton City Council's Chief Executive on 30 June 2025.

Submission # 808

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

Introduction

1. Hamilton City Council staff welcome the opportunity to make a submission to the Department of Conservation (DoC) on its May 2025 Discussion Document **Action for Nature – Implementing New Zealand’s Biodiversity Strategy 2025–2030**.
2. While Hamilton City does not contain any DoC land, we are home to native biodiversity, including nationally threatened species. Hamilton City Council supports the investment in native biodiversity through our district plan and strategies.

Key Messages and Recommendations

3. We support actions to implement the goals from Te Mana o Taiao – Aotearoa New Zealand Biodiversity Strategy 2020.
4. The Implementation Plan needs more details on DoC’s implementation of Te Mana o Taiao goals.
5. We support Theme 1 actions focusing on biodiversity benefits by DoC. However, there needs to be consideration for non- focus species and areas too.
6. More details are needed on implementing the actions of Themes 2 and 3.
7. Action is needed to support the analysis and reporting of existing information held by DoC.
8. We support Theme 4 actions. However, more implementation details of actions are needed.

Theme 1: Agreed Biodiversity Priorities are Driving Investment and Action

9. We support Action 1, for a national picture of biodiversity values. Limited funding and resources require focused direction through stakeholder input. An overarching plan must address ecosystems, habitats, and threatened species, recognising their interconnection across human-constructed boundaries.
10. We recommend adding clarity on the value types being considered e.g. biodiversity, climate influence, cultural, economic. Is the cost of protection versus biodiversity benefit considered? Clarify if other government priorities will affect the list, potentially risking biodiversity loss.
11. Consider communication and support for non-prioritised species and ecosystems. The valued list guides DoC’s resource focus. The non-valued list still needs care and could be promoted to communities, organisations, or private enterprises for investment. To be valued, they must be known.
12. We support Action 2, focusing DoC funding on priority programmes. However, actions with lower cost per hectare or species that provide general biodiversity benefits should also be considered.

Theme 2: Increased External Funding, Revenue and Support is Delivering more Work on Biodiversity Priorities

- 13.** We support Action 3 to create an investment prospectus for biodiversity funding, recognising it as a shared responsibility beyond public organisations. Templates for prospectuses could help local investment. Natural heritage protection is underfunded in New Zealand, and private sector investment should not reduce DoC funding.
- 14.** We believe Action 4 lacks implementation details. While some information was given on the development of a revenue model, benefits must be accounted for, and a list of potential revenue sources or investigation processes should be provided.
- 15.** Action 5 lacks details on DoC implementation of supporting private investment. Although DoC is not the lead organisation, more information on their involvement should be given.
- 16.** We support Action 6 to reduce barriers to government support and incentives for protecting biodiversity on Maaori land. Assisting Maaori landowners to protect biodiversity on their land has benefits for all and strengthens Maaori kaitiaki.

Theme 3: An Evidence and Knowledge-Based Approach is Driving Improvements in Practice and Decision-Making for Biodiversity

- 17.** We have concerns about Action 7. DoC and other organisations hold valuable monitoring data that should be more accessible and analysed. Improved access, staffing, and expertise are needed for data management and reporting. This can be used to answer the proposed questions. Continued monitoring shows investment outcomes. Existing datasets could be used to identify effective actions without large-scale investment.
- 18.** We agree that standards for measuring outcomes in relation to private biodiversity investment will help with the consistency of data.
- 19.** We believe data from depositories like TrapNZ and the National Vegetation Survey Databank support improved biodiversity outcomes. Long-term support and retention of these databases is needed as part of a strategy, as well as the need for meta-analysis at different scales to cater for various users, from government to local. This can improve information on where action is needed.
- 20.** Action 8 lacks details on how DoC will support Maaori inclusion in decision-making and biodiversity management. Implementation details are needed.
- 21.** Action 9 needs more detail on how DoC will capture and embed learning from successful partnerships. Creating templates or guidance documents from existing models and lessons learned would benefit both internal and external biodiversity programs.
- 22.** We support Action 10 to provide case studies and develop operational documents from research to support investment in nature-based solutions. Hamilton City Council is interested in nature-based solutions and would welcome guidance in effectively using these solutions.
- 23.** Exotic browsers reduce biodiversity and carbon sequestration. A browser control plan should be prioritised in operational planning and guidance.

Theme 4: Increased Capability and Support Enables New Zealand to Address the State of our Biodiversity

- 24. We support Action 11. We believe that the action requires detail on how DoC will implement a plan to address the gaps.
- 25. We strongly support Action 12 to raise public awareness of New Zealand's biodiversity crisis. We recommend DoC develop a plan for the creation of resources that can be shared at the local and regional level, as well as the development of a national campaign highlighting species loss, habitat and ecosystem degradation, beyond the key biodiversity values highlighted in Action 1.
- 26. We support Action 13 for an inter-agency biosecurity approach. With climate change and global changes, biosecurity is increasingly important, and DoC plays a crucial role.
- 27. We believe there is a gap in training in the biodiversity space. Programmes like the Jobs for Nature programme and Predator Free NZ 2050 provide positive biodiversity outcomes and quality training, increasing skilled people and community knowledge. These are examples of increasing capability to address the state of our biodiversity.

Overall Package of the Proposal

- 28. The implementation plan does not address all national targets in Te Mana o Taiao, with some actions merely restating goals. It lacks detailed steps for implementation.
- 29. We hope that DoC receives adequate funding to fulfil its obligations to maintain, restore and protect New Zealand Aotearoa's natural biodiversity, and assists others to do so.

Further Information and Opportunity to Discuss our Submission

- 30. Should the Department of Conservation require clarification of the submission from Hamilton City Council staff, or additional information, please contact **Maria Barrie** (Parks and Recreation Unit Director) on **021 775 629**, or email Maria.Barrie@hcc.govt.nz in the first instance.
- 31. Hamilton City Council representatives would welcome the opportunity to discuss the content of this submission in more detail with the Department of Conservation.

Yours faithfully



Lance Vervoort
CHIEF EXECUTIVE

FURTHER INFORMATION

Hamilton City Council
Garden Place, Private Bag 3010, Hamilton

-  /hamiltoncitycouncil
-  @hamiltoncitycouncil
-  07 838 6699

hamilton.govt.nz