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Ministry for the Environment  
[indigenusbiodiversity@mfe.govt.nz](mailto:indigenusbiodiversity@mfe.govt.nz)

## Canterbury Mayoral Forum Submission on the Ministry for the Environment's exposure draft of the National Policy Statement for Indigenous Biodiversity

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1. The Canterbury Mayoral Forum thanks the Ministry for the Environment for the opportunity to provide feedback on the National Policy Statement for Indigenous Biodiversity (NPSIB) exposure draft.

### Background and context

2. The Canterbury Mayoral Forum comprises the mayors of the ten territorial authorities in Canterbury and the Chair of the Canterbury Regional Council (Environment Canterbury), supported by our Chief Executives. The purpose of the Forum is to promote collaboration across the region and increase the effectiveness of local government in meeting the needs of Canterbury's communities.
3. The eleven local authorities are: Kaikōura, Hurunui, Waimakariri, Selwyn, Ashburton, Timaru, Mackenzie, Waimate and Waitaki District Councils, the Christchurch City Council and Environment Canterbury.
4. In this submission, the Canterbury Mayoral Forum has provided comments on some of the key issues for Canterbury in the consultation document. We note that some Canterbury councils are also planning to make more detailed individual submissions. The Canterbury Mayoral Forum submission is intended to complement those submissions.
5. Please note that the Hurunui District Council did not participate in the development of this regional submission and will instead provide its own submission.

*Mayors standing together for Canterbury.*

Secretariat, E: [secretariat@canterburymayors.org.nz](mailto:secretariat@canterburymayors.org.nz) W: [www.canterburymayors.org.nz](http://www.canterburymayors.org.nz)  
C/- Environment Canterbury, PO Box 345, Christchurch 8140 T: 03 345 9323

## **Submission comments**

6. The Canterbury Mayoral Forum generally supports the objective and policies set out in the exposure draft, and the overall goal of maintaining and restoring indigenous biodiversity. We support Te Rito o te Harakeke as a fundamental concept that will foster a partnership-based approach to the management of indigenous biodiversity.
7. We understand that councils will work with tangata whenua to develop local approaches to give effect to Te Rito o te Harakeke, identify and protect taonga species, and recognise te ao Māori in biodiversity management. As Te Rito o te Harakeke is the foundation of the document, and for many councils a new concept which the document does not define well, we caution that there is the potential for uncertainty in its implementation.
8. While the Mayoral Forum supports the intent of the exposure draft, we do have some concerns about the implementation of the NPSIB. These concerns are set out below.

## **Impact on rural communities**

9. The Canterbury region includes a number of small territorial authorities with extensive tracts of indigenous vegetation. These communities are the stewards and kaitiaki of much of our indigenous biodiversity, which offers benefits that spill over to the national level.
10. These communities are already facing rising costs on the economic utility of their properties as a result of climate change and other ongoing reform programmes. Careful and considered engagement with these communities, as well as support for implementation, will be required to ensure the NPSIB does not further negatively impact these communities.

## **Timeframes for implementation – identification of significant natural areas**

11. We note that the exposure draft proposes a new requirement to identify and map significant indigenous vegetation and significant habitats of indigenous fauna as significant natural areas (SNAs). Within five years, territorial authorities are to identify SNAs that have not previously been identified, using the criteria set out in the NPSIB. In addition, existing SNAs are required to be confirmed by an ecologist that they still qualify as an SNA under the criteria contained in the NPSIB.
12. Our view is that this timeframe is simply not realistic and may therefore result in undesirable outcomes. This is for the following key reasons:
  - there are capacity and resourcing issues relating to both ecologists – who are essential in the identification and management of SNAs – and councils, who are already stretched amid an uncertain resourcing environment due to the Government's broader reform programme. Depending upon the nature of each

district, primarily the number and extent of SNAs, the proposed SNA identification programme will require multi-million-dollar expenditure

- building and maintaining positive relationships with landowners has been a critical component of successful SNA identification processes in Canterbury. Identification of SNAs is heavily dependent upon ground truthing, which requires trusted relationships with individual landowners. Developing these relationships takes time and requires skill, expertise and long-term commitment. The exposure draft gives little in the way of incentives to encourage voluntary access by landowners to council staff. Use of powers of entry will erode goodwill with landowners and the time and effort required to build trust and gain access to properties should not be under-estimated.

13. To assist councils to meet these timeframes for implementation, we suggest that Government clarifies the support regional councils would provide, if requested, to territorial authorities for the identification of SNAs and the inclusion of them within district plans and policy statements.
14. As noted above, assessing SNAs will be a significant undertaking for most local authorities, particularly for smaller councils that have small rating bases but large areas of indigenous vegetation. Targeted support for these local authorities should be prioritised.

### **Exceptions to managing adverse effects on SNAs of new subdivision, use and development**

15. We note that section 3.11(2)(b) provides an exception when the activity has national or regional public benefit, there is a functional or operational need for the new use or development to be in that particular location, and there are no practicable alternative locations.
16. We suggest this could be developed further, so a project would be required to document the different options considered (for example: alternate routes, locations and designs) in order to prove that the modification or destruction of an SNA is the only feasible option and how mitigation measures have been considered.
17. We are also concerned that this provision may be used for private development at the expense of indigenous biodiversity.

### **Conclusion**

18. Thank you once again for the opportunity to make a submission on this consultation document.

19. Our secretariat is available to provide any further information or answer any questions the Ministry may have about our submission. Contact details are: Maree McNeilly, Canterbury Mayoral Forum Secretariat, [secretariat@canterburymayors.org.nz](mailto:secretariat@canterburymayors.org.nz) , 027 381 8924.

Ngā mihi

A handwritten signature in black ink, consisting of a stylized 'S' followed by a horizontal line that tapers to the right.

Sam Broughton  
Mayor, Selwyn District  
Chair, Canterbury Mayoral Forum