



# Submission form – implementation plan for Aotearoa New Zealand Biodiversity Strategy

## ***Have your say on the next implementation plan for Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy 2020***

This is the MS Word submission template for responding to the discussion document *Action for nature - Implementing New Zealand's Biodiversity Strategy 2025 to 2030 - Discussion document*

The Department of Conservation (DOC) seeks your feedback by **5pm on Monday 30 June 2025**.

Make your submission as follows:

1. Choose method of submission: online form, email, or post.
2. Access the online form or download the Word document to complete and email or post.
3. Fill out your details under the “Your name and organisation” heading and, if applicable, check the boxes underneath on privacy and confidentiality.
4. Fill out your responses to the discussion document questions. Your submission may respond to any or all of the questions.
5. All submissions are subject to the Official Information Act 1982 and can be released, if requested, under that Act. If you have specific reasons for wanting parts, or all, of your submission withheld, please note these on page 2. DOC will consider them when making any assessment about the release of submissions. Please refer to DOC’s privacy statement for further information.<sup>1</sup>
6. Submit your comments:
  - a. via the online form, or
  - b. email your submission to [biodiversitystrategy@doc.govt.nz](mailto:biodiversitystrategy@doc.govt.nz) or
  - c. mail your submission to us at:

Department of Conservation  
PO Box 10420, Wellington 6140  
Attention: Biodiversity strategy consultation submissions

Please direct any questions that you have in relation to the submissions process to [biodiversitystrategy@doc.govt.nz](mailto:biodiversitystrategy@doc.govt.nz) .

Please note that submissions that contain offensive language will not be accepted. Anonymous submissions will generally not be accepted, including submissions made under only a first name or using only initials. If a submission has not been accepted for these reasons, it will be returned to the submitter.

# Submission on the next implementation plan for Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy 2020

*Your name and organisation*

[To check the boxes below: Double click on box, then select 'checked']

Name and organisation	
Name	Saul Gudsell
Organisation (if applicable)	Hawke's Bay Regional Council
Contact details (e-mail preferred)	Saul.gudsell@hbrc.govt.nz
Please tell us which kind of submitter you are.	<input type="checkbox"/> Individual <input type="checkbox"/> Iwi, hapū <input type="checkbox"/> Māori organisation <input checked="" type="checkbox"/> Statutory body <input type="checkbox"/> Environmental Non-Governmental Organisation <input type="checkbox"/> Expert or science sector <input type="checkbox"/> Tourism or recreation sector <input type="checkbox"/> Business or philanthropic sector <input type="checkbox"/> Community group <input type="checkbox"/> Primary sector <input type="checkbox"/> Other _____

<b>Submission form – Release of information</b>
DOC may release a summary of submissions. Contact details would not be included in this summary. Please let us know if you would like your Name and / or Organisation or any part of your submission to not be included in a summary of submissions and to be kept confidential.
<input type="checkbox"/> Please keep confidential, and do not include, my name or any other personal information in a summary of submissions.
[Insert information to be withheld from a summary]
<b>Official information Act requests</b> All submissions are subject to the Official Information Act 1982 and can be released, if requested, under that Act.
<input type="checkbox"/> Please withhold my entire submission, or the following identified parts of my submission. I have stated below my reasons and grounds under the Official Information Act that I believe apply, for consideration by DOC. Below:
[Insert text]
DOC will take the reasons and grounds supplied into account when responding to requests under the Official Information Act. DOC may consult with submitters as it considers necessary. Please supply your email for this purpose:
Saul.gudsell@hbrc.govt.nz

## Responses to questions

To check the boxes below: Double click on box, then select 'checked' Please select only one checkbox per action.

Theme 1 - Agreed biodiversity priorities are driving investment and action.	
1.	<p><i>Action 1. Develop a national picture of our most important biodiversity values and quantify the costs to protect and restore priority species and habitats.</i></p> <p>a. What do you think of this action?</p> <p><input checked="" type="checkbox"/> Strongly support   <input type="checkbox"/> Support   <input type="checkbox"/> Neutral   <input type="checkbox"/> Oppose   <input type="checkbox"/> Strongly oppose   <input type="checkbox"/> Unsure</p> <p>Add any comments below.</p> <hr/> <p>We understand this is necessary to help biodiversity groups outside of central and local government understand where and what focus areas are. Also to understand the costs of protecting and restoring these (which may help with more targeted and complete funding applications). However, if this action is limited to identifying important biodiversity values on public conservation land (PCL), it is unlikely to change business as usual for regional council.</p> <p>Furthermore, instead of focusing on a national picture, it might be more practical to adopt a regional approach, leveraging existing relationships and infrastructure. Regional councils and DOC officers can identify shared priorities at the regional level, where it is advantageous. Creating a shared framework for collaboration could be beneficial.</p> <hr/> <p>b. Is there anything you would add or change?</p> <p><input checked="" type="checkbox"/> Yes   <input type="checkbox"/> No</p> <p>Add any comments below.</p> <hr/> <p>Quantifying costs should also include ongoing management costs, often protection and restoration work, when 'finished' is at risk of re-invasion (or such) and this can also be costly.</p> <p>The discussion document envisages no new information would be collected and existing information used to develop a national picture. This is concerning as we do not have a lot of information on some of the high value biodiversity sites in our region, and TAs have often relied heavily on the PNAP reports from the 1990s for example. More investment is needed to build a better picture, and as a far larger proportion of ecosystem loss has been in lowland areas which are largely privately owned, continuing to focus on existing information and PCL risks continuing to improve our most threatened ecosystem types.</p> <p>Also important to ensure prioritisation is done using common language, for example different agencies have used different ecosystem typologies giving different end results. Important to continue work to standardise systems across agencies.</p>
2.	<p><i>Action 2. Tackle biodiversity loss by agreeing on priority programmes to:</i></p> <ul style="list-style-type: none"> <li>• <i>protect and restore high-priority degraded habitats (e.g. impacts from browsers, weeds, predators)</i></li> <li>• <i>recover native species</i></li> <li>• <i>develop nature-based solutions for biodiversity and climate change (e.g. wetland restoration), in light of environmental and climate change responsibilities.</i></li> </ul>

	<p>a. What do you think of this action?</p> <p><input checked="" type="checkbox"/> Strongly support   <input type="checkbox"/> Support   <input type="checkbox"/> Neutral   <input type="checkbox"/> Oppose   <input type="checkbox"/> Strongly oppose   <input type="checkbox"/> Unsure</p> <p>Add any comments below.</p>
	<p>This is already underway at a regional level, however, this may formalise the agreement process. This is important to ensure that what resources/funding is available is directed where it is most needed. Would also help put our regional priorities in context (e.g: if acutely threatened poor condition remnant here, but a large extent and good condition remnant just over the border, that would influence our regional prioritisation).</p> <p>Furthermore, if action 1 is meant to identify key values or priorities for action 2, it must provide clear, unbiased evidence for decisions on priority programmes.</p>
	<p>b. Is there anything you would add or change?</p> <p><input checked="" type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p>Add any comments below.</p>
	<p>Nature-based solutions need to be genuinely nature-based, a lot of approaches seem to make their way under this umbrella. Also needs to be focus on operationalising these, has been huge investment into literature reviews and modelling, that won't necessarily translate into work on the ground.</p>

**Theme 2 – Increased external funding, revenue and support is delivering more work on biodiversity priorities**

3.	<p><i>Action 3. Develop a biodiversity investment prospectus to attract and direct external investment into biodiversity priorities.</i></p> <p>a. What do you think of this action?</p> <p><input checked="" type="checkbox"/> Strongly support   <input type="checkbox"/> Support   <input type="checkbox"/> Neutral   <input type="checkbox"/> Oppose   <input type="checkbox"/> Strongly oppose   <input type="checkbox"/> Unsure</p> <p>Add any comments below.</p>
	<p>If this does not act as a driver for companies looking to offset. Need to ensure biodiversity is truly benefitted through this work, rather than “nature-washing”.</p>
	<p>b. Is there anything you would add or change?</p> <p><input type="checkbox"/> Yes                      <input checked="" type="checkbox"/> No</p> <p>Add any comments below.</p>
	<p>[Insert text]</p>

4.	<p><i>Action 4. Generate new revenue from public conservation lands and waters to invest back into biodiversity.</i></p> <p>a. What do you think of this action?</p> <p><input checked="" type="checkbox"/> Strongly support   <input type="checkbox"/> Support   <input type="checkbox"/> Neutral   <input type="checkbox"/> Oppose   <input type="checkbox"/> Strongly oppose   <input type="checkbox"/> Unsure</p> <p>Add any comments below.</p>
	<p>The discussion document suggests that any new revenue should be used to maintain biodiversity on PCL. However, it would be more beneficial if the revenue were reinvested into the broader system, potentially funding agreed priority programs, rather than solely maintaining biodiversity on PCL.</p> <p>Clearly the biodiversity crisis (and trying to fix it) needs funding, any further new revenue to help this should be welcomed.</p>
	<p>b. Is there anything you would add or change?</p> <p><input checked="" type="checkbox"/> Yes   <input type="checkbox"/> No</p> <p>Add any comments below.</p>
	<p>We need to better communicate the economic benefits of protecting biodiversity (e.g: from discussion document - A 2013 study estimated the total economic value of New Zealand’s land-based ecosystems and the services they provide to be \$57 billion, or 27% of gross domestic product at that time) to ensure other work (e.g: erosion control, flood management) is cognisant of the co-benefits of protecting biodiversity.</p> <p>Also, while generating revenue from commercial activities is a good idea, it should not negatively impact everyday users and visitors of PCL. This approach could create a class system where only those who can afford it would be able to visit New Zealand's most special places.</p>

**Theme 2 – Increased external funding, revenue and support is delivering more work on biodiversity priorities ... continued**

5.	<p><i>Action 5. Increase commercial investment in biodiversity by supporting the business sector to develop a system for private sector nature-based financial disclosures, reporting and investment.</i></p> <p>a. What do you think of this action?</p> <p><input checked="" type="checkbox"/> Strongly support   <input type="checkbox"/> Support   <input type="checkbox"/> Neutral   <input type="checkbox"/> Oppose   <input type="checkbox"/> Strongly oppose   <input type="checkbox"/> Unsure</p> <p>Add any comments below.</p>
	<p>The nature-based financial disclosure reporting and investment system would need to be certified (by Govt department) to be meaningful (and reliable) and counter ‘green washing’ claims some businesses make/and meet information requirements for consumers.</p>
	<p>b. Is there anything you would add or change?</p>

	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Add any comments below.
	[Insert text]
6.	<p><i>Action 6. Increase the protection of biodiversity on private and Māori land by improving the accessibility and coordination of government support and incentives.</i></p> <p>a. What do you think of this action?</p> <input checked="" type="checkbox"/> Strongly support <input type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Oppose <input type="checkbox"/> Strongly oppose <input type="checkbox"/> Unsure Add any comments below.
	<p>Strongly agree. Many At-risk species or environments are found on this land. Here in Hawke’s Bay, some of the only remaining remnants of native vegetation or species are found on private or Māori land. However, more needs to be done than ‘reducing barriers’. The enabling factor is funding such as ‘ecosystems service payments’, as the landowner is providing a service (in protecting an area) for the wider community. Support (such as technical advice) is often not enough to drive change.</p>
	<p>b. Is there anything you would add or change?</p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Add any comments below.
	<p>This is especially important as ongoing maintenance is often not factored in, especially when people get funding for planting projects.</p>

<b>Theme 3 – An evidence and knowledge-based approach is driving improvements in practice and decision making for biodiversity</b>	
7.	<p><i>Action 7. Agree and implement an achievable set of priority indicators for monitoring progress on the national targets, monitoring the effectiveness of interventions, and meeting statutory and international reporting requirements.</i></p> <p>a. What do you think of this action?</p> <input checked="" type="checkbox"/> Strongly support <input type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Oppose <input type="checkbox"/> Strongly oppose <input type="checkbox"/> Unsure Add any comments below.
	<p>We consider this a priority among the proposed actions. For regional councils, our monitoring programmes are centred on our statutory obligations, which limits our capacity for additional monitoring and reporting beyond this mandate. Therefore, we would like this action to enhance the alignment of monitoring and reporting across agencies and provide a straightforward framework to assist in monitoring Te Mana o Te Taiao outcomes. There is a significant amount of work occurring in this area within and across agencies, which needs to be interconnected.</p>

	<p>Furthermore, this should tie in with any Resource Management reform that looks at monitoring and reporting requirements of Regional Councils (currently under s35 of the RMA) on the state of the environment. A standardised set of priority indicators across agencies makes sense for reporting requirements.</p>
	<p>b. Is there anything you would add or change?</p> <p><input checked="" type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>Add any comments below.</p>
	<p>Any indicators need a robust scientific basis, so they are truly capturing the state of biodiversity. Also needs to be recognition of resourcing needs - smaller councils cannot afford to do wide-scale robust monitoring and development of standardised methods that are affordable to implement is crucial. Lots of emerging opportunities with remote sensing etc but need support to actually implement these into Council monitoring programmes. This needs to be driven by the people likely to be doing the monitoring- would suggest Te Uru Kahika Biodiversity Working Group a key umbrella that would work well.</p>
<p>8.</p>	<p><i>Action 8. Support Māori to use knowledge systems, including mātauranga, in decision making and biodiversity management</i></p> <p>a. What do you think of this action?</p> <p><input checked="" type="checkbox"/> Strongly support    <input type="checkbox"/> Support    <input type="checkbox"/> Neutral    <input type="checkbox"/> Oppose    <input type="checkbox"/> Strongly oppose    <input type="checkbox"/> Unsure</p> <p>Add any comments below.</p> <p>Regional council is undertaking further work to improve our own practices in relation to receiving and using mātauranga Māori. We support this in principle but see issues around implementation, largely around capacity. Further guidance on how to do this meaningfully is needed.</p> <p>b. Is there anything you would add or change?</p> <p><input checked="" type="checkbox"/> Yes      <input type="checkbox"/> No</p> <p>Add any comments below.</p>
	<p>Again, needs to be recognition of resourcing constraints - for meaningful consultation there needs to be enabling of capacity.</p>

**Theme 3 – An evidence and knowledge-based approach is driving improvements in practice and decision making for biodiversity ... continued**

<p>9.</p>	<p><i>Action 9. Capture and embed the lessons from existing partnership-based delivery models for biodiversity and biosecurity management to inform decisions on future programmes.</i></p> <p>a. What do you think of this action?</p> <p><input type="checkbox"/> Strongly support <input checked="" type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Oppose <input type="checkbox"/> Strongly oppose <input type="checkbox"/> Unsure</p> <p>Add any comments below.</p> <hr/> <p>It is unclear what capture and embed entails. Does this entail creating a national database of partnership-based delivery models for future projects to base their design on?</p> <p>Furthermore, does this already exist (Tuhino Taiao webpage)?</p> <hr/> <p>b. Is there anything you would add or change?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Add any comments below.</p> <hr/> <p>There is a need to balance capturing learnings and continuing support for effective projects, with not just favouring the same groups for a long time without proven outcomes.</p>
<p>10.</p>	<p><i>Action 10. Encourage optimal investment in nature-based solutions, including the restoration and protection of native ecosystems for carbon and biodiversity benefits, by improving the evidence base, developing case studies and operationalising existing research.</i></p> <p>a. What do you think of this action?</p> <p><input checked="" type="checkbox"/> Strongly support <input type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Oppose <input type="checkbox"/> Strongly oppose <input type="checkbox"/> Unsure</p> <p>Add any comments below.</p> <hr/> <p>First and foremost, it would be helpful to have a clear definition of nature-based solutions as a starting point.</p> <p>Any work done on this action should really emphasise operationalising these solutions, with urgency for improving wetland condition and extent, representing an acutely threatened ecosystem type all over the country.</p> <hr/> <p>b. Is there anything you would add or change?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Add any comments below.</p> <hr/> <p>[Insert text]</p>

## Theme 4 – Increased capability and support enables New Zealand to address the state of our biodiversity

11.	<p><i>Action 11. Develop a cross-sector plan to address the most important capability gaps in the biodiversity system.</i></p> <p>a. What do you think of this action?</p> <p><input checked="" type="checkbox"/> Strongly support   <input type="checkbox"/> Support   <input type="checkbox"/> Neutral   <input type="checkbox"/> Oppose   <input type="checkbox"/> Strongly oppose   <input type="checkbox"/> Unsure</p> <p>Add any comments below.</p> <hr/> <p>Conduct desktop research on capability gaps already identified by agencies and current approaches to building capability that could be leveraged. Utilise already existing capability assessments and programmes to then help address these gaps.</p> <p>Botanical skills are a key gap and not taught as part of many ecology degrees. Tier I has been key pathway for gaining these for so many people, but these are really important for biodiversity management and other activities (e.g: wetland delineation).</p> <hr/> <p>b. Is there anything you would add or change?</p> <p><input type="checkbox"/> Yes   <input checked="" type="checkbox"/> No</p> <p>Add any comments below.</p> <hr/> <p>[Insert text]</p>
12.	<p><i>Action 12. Increase New Zealanders’ awareness of the causes and extent of our biodiversity crisis, show how they can make a difference to biodiversity in their communities, and drive urgency and momentum for action.</i></p> <p>a. What do you think of this action?</p> <p><input type="checkbox"/> Strongly support   <input checked="" type="checkbox"/> Support   <input type="checkbox"/> Neutral   <input type="checkbox"/> Oppose   <input type="checkbox"/> Strongly oppose   <input type="checkbox"/> Unsure</p> <p>Add any comments below.</p> <hr/> <p>Regional councils usually promote biodiversity and biosecurity activities to their communities through regular communications. A unified voice and consistent messaging across central and regional government would be beneficial.</p> <hr/> <p>b. Is there anything you would add or change?</p> <p><input type="checkbox"/> Yes   <input checked="" type="checkbox"/> No</p> <p>Add any comments below.</p> <hr/> <p>[Insert text]</p>

## Theme 4 – Increased capability and support enables New Zealand to address the state of our biodiversity ... continued

13.	<p><i>Action 13. Establish cross-agency emerging risks capability for domestic biosecurity to horizon scan, share intelligence and support decision-makers in prioritising emerging risk management.</i></p> <p>a. What do you think of this action?</p> <p><input checked="" type="checkbox"/> Strongly support   <input type="checkbox"/> Support   <input type="checkbox"/> Neutral   <input type="checkbox"/> Oppose   <input type="checkbox"/> Strongly oppose   <input type="checkbox"/> Unsure</p> <p>Add any comments below.</p>
	<p>[Insert text]</p>
	<p>b. Is there anything you would add or change?</p> <p><input type="checkbox"/> Yes                      <input type="checkbox"/> No</p> <p>Add any comments below.</p>
	<p>[Insert text]</p>

## Overall package of proposals

14.	<p>a. Overall, are these actions the ones we should focus on to drive the protection, restoration and sustainable use of biodiversity in New Zealand between now and 2030?</p> <p><input checked="" type="checkbox"/> Yes                      <input type="checkbox"/> No                      <input type="checkbox"/> Unsure                      <input type="checkbox"/> No comment</p> <p>Add any comments below.</p>
	<p>We largely agree, however we think it is important that there is ongoing consultation to finalise actions. We also think it is important that the consultation undertaken includes a range of stakeholders including local government, communities, and stakeholders etc.</p>
	<p>b. What do you think of the proposals as a package?</p> <p><input type="checkbox"/> Strongly support   <input checked="" type="checkbox"/> Support   <input type="checkbox"/> Neutral   <input type="checkbox"/> Oppose   <input type="checkbox"/> Strongly oppose   <input type="checkbox"/> Unsure</p> <p>Add any comments below.</p>
	<p>We would like to see these actions result in work on the ground and a meaningful difference to biodiversity i.e. reduction in threatened species.</p>