

# DRAFT

## Auckland Council Submission to DOC Threatened Species Strategy

Auckland Council (“the Council”) thanks the Minister and the Department of Conservation (“DOC” or “the department”) for the opportunity to comment on the release of the draft strategy. This submission is on behalf of the Auckland Council, and its facility the Auckland Botanic Gardens.

The Council congratulates you on the ongoing commitment displayed to taking a leadership role in the protection and enhancement of New Zealand’s indigenous biodiversity, including threatened species.

The Council considers that the draft Threatened Species Strategy effectively outlines the Department’s partnership approach to threatened species management and provides good context on how current initiatives such as Predator Free 2050 and War on Weeds contribute to species management nationally.

The Council’s feedback is provided on the basis of the Council being a committed and active manager of threatened species. We engage in this work in response to our requirements under the RMA to protect significant indigenous vegetation and the habitats of significant indigenous fauna as a matter of national importance, and to maintain indigenous biodiversity. We are also mandated by the LGA to deliver on our communities’ strong expectations for healthy and accessible indigenous biodiversity on public and private land. As the owner of significant areas of public reserve and parkland in Auckland, the Council has a significant opportunity to showcase to the public best practice conservation management. The Council has set itself the goal of ensuring no further regional extinctions of indigenous species<sup>1</sup>, and has several initiatives which support the achievement of this goal, including a regional Ecosystem and Species Management Programme.

Furthermore, the Auckland Council has just launched its own landscape scale biodiversity initiative – “Pest Free Auckland” (working title). This is intended to complement the Predator Free 2050 initiative, and augment its implementation in Auckland, with the ambitious target of making Auckland pest and predator free by 2050. The Council recognises that the key to its success will be partnerships with DOC and others.

We acknowledge that DOC’s focus is national and resources are generally targeted to protect species at the minimum number of sites needed to ensure their persistence. This approach does mean that for some regions there is disproportionate investment by DOC in species management and that without council and community investment it is quite possible that regionally important species populations could be lost. Our current experience is that DOC’s focus and priorities do not always align with local and regional

---

<sup>1</sup> Auckland Plan (2011) and Auckland Council’s Indigenous Biodiversity Strategy (July 2012).

initiatives and we would be concerned if the implementation of the strategy further reduced the department's level of support for regional and local programmes.

In the Council's view, the draft strategy does not adequately emphasize the critical role of strategic partners such as unitary authorities and regional councils. We expand upon this further below in relation to specific components of the draft strategy.

Auckland Council considers that the department should prioritise resourcing of national species and ecosystem management, including as outlined in the draft strategy.

Nevertheless, the Council can and does play an active role in the protection and enhancement of threatened species, both at the Governing Body level, and through Local Board initiatives, and recognises that a successful, integrated working relationship with the department is crucial.

As part of the implementation of this strategy, we would like to identify ways in which our existing working relationship can be strengthened and improved to address our common goals. We consider that further work could be done to align priorities and funding streams to encourage projects in Auckland that reflect the interests of the regional and individual local communities, while achieving the goals of the strategy.

The Council's feedback generally follows the structure of the strategy and includes comments and suggestions for inclusion. We also include discussion of the Council's role in relation to the objective and tools of the strategy, and some suggestions in relation to implementation of the strategy.

Our feedback is presented under the following headings:

1. The Purpose and Vision
2. Focus and Strategic Themes
3. Goals
4. The Right Tools for the Job
5. Myrtle Rust

## **1. Purpose and Vision**

The Council supports the strategy purpose, and in particular the recognition that successfully addressing the issue of threatened species requires a broader consideration than just species currently identified as 'threatened', by including a focus on 'at risk' species as well. That is, measures must be taken to prevent other species reaching this state, as well as to manage those species which have unfortunately already declined to the point of being 'threatened'.

The Council also supports the strategy's vision, including the approach of prioritising efforts to support threatened and at risk species recovery so as to maximise beneficial outcomes, with the goal of getting these prioritised species on a path to recovery.

The Vision correctly identifies the importance of partnerships in addressing this issue.

However, the Council suggests that the purpose and vision could more explicitly identify that the strategy seeks to see these species safe in 'the wild' or sustainable sanctuaries, where this is possible. Ultimately, long term survival of these species as functioning, accessible components of our environment is dependent on there being safe and sufficient habitat in which they can live.

We note that this is consistent with other aspects of the strategy, and consider incorporation of this into these overarching components of the strategy would be appropriate.

The Council suggests wording could be amended along the lines (additions underlined):

Purpose statement:

"This Threatened Species Strategy sets out the New Zealand Government's plan to halt the decline in our threatened species and restore them to healthy populations, living in restored natural habitats."

And/or

Vision statement:

"This Threatened Species Strategy aims to safeguard our vulnerable threatened species and set them on a recovery path which enables them to thrive, and be appreciated, in natural habitats."

## **2. Focus and Strategic Themes**

The five themes outlined in the focus section are supported. They collectively identify the importance of managing vulnerable species on private and public land, through the management of the ecosystems in which they are found and by developing and implementing innovative approaches informed by both science and Mātauranga Māori.

The emphasis in the discussion of "Focusing beyond public conservation land" of effectively addressing private and public land is strongly supported.

However, the Council considers that, notwithstanding the critical importance of effective predator control in restoring habitats and ecosystems, there are a broader range of management responses that are also important and which are not well reflected in the discussion of these themes.

For example the theme of “Managing ecosystems at scale to protect species” could usefully mention this broader range of responses, including ecological restoration, site led weed control to address specific threats to threatened species, habitat protection and managing the effects that can arise from pest control disrupting the complex relationships between predators and their environment (e.g. mice population explosions post rat control, with significant impacts on some native plant species).

However, the Council knows that successfully managing pests and ecosystems at a landscape scale, including through the use of community efforts, poses significant challenges. It will require a high degree of direction by the department and strategic partners to ensure that landscape-scale pest control and other responses are undertaken using best practice methodology, and occur in a co-ordinated way that can guarantee that threatened species are secure. We look forward to working with the department in addressing this.

The Council also supports the emphasis on the importance of building the science and knowledge base. Given the existing and potential threats to indigenous biodiversity, including threatened species, it is critical that we focus our considerable scientific expertise and the wisdom of Mātauranga Māori to anticipate and respond to threats (and opportunities).

### **3. Goals**

#### **Goal 1 - Manage 500 species for protection by 2025 – a 40% increase on today – and 600 species for protection by 2030.**

The Council supports an increase in the number of species being actively managed.

However, notwithstanding the proposed increase in the number of species managed, the Council suggests that DOC should commit to an even more ambitious target, given the vulnerable status of many of our native species, and be resourced to achieve this target.

Nevertheless, the Council recognises the absolute necessity of prioritising responses, and notes that the Auckland Council has aligned its prioritisation methodology for species and ecosystems with that of the department's. This congruence is expected to support greater cooperation and integration, leading to more successful management in Auckland.

We note also that the primary mechanisms identified for achieving this goal, are Predator Free 2050, Battle for Our Birds and War on Weeds. While the Council agrees that pest (animal, plant and other) control is perhaps the most important conservation requirement in NZ, and that these are important initiatives which will play a major role in the delivery of improved conservation outcomes, the strategy could better identify that a broad range of responses will be needed to achieve an increased level of protection.

There should also be better recognition of the ways that other parties, including Councils, contribute to these actions.

## **Goal 2 - Enhance the populations of 150 prioritised threatened and at risk species by 2025.**

The Council supports the approach embodied in this goal of considering the broader population requirements of threatened species, beyond simply removing predators and other pests.

The Council is also generally supportive of the list of animal species identified for this increased focus, and considers that the approach of utilising both social and scientific values is valid, as long as there is sufficient emphasis on the latter to ensure programmes deliver effective conservation outcomes.

The NZ Threat Classification System is a long standing, scientifically valid and well known approach, whereas the factors that have informed the social component of the assessment are not clear, and there are concerns that that plant conservation, with a generally lower profile than wildlife, may be disadvantaged by this approach

The Council's plant experts advise that it is difficult to understand the logic behind the selection of some of the plant species on the list, and there are plants missing which they would expect to have seen. For example, there are seven *Lepidium* species on the list, while other nationally important species, such as *Leptinella rotundata*, a nationally vulnerable species found only in Auckland and Northland is absent.

We recognise that the list represents species that the department will be managing with a national focus, which is supported, but would be concerned if this meant a lessening of support for programmes relating to other species, or species identified in the Strategy but away from priority management sites.

We recommend that the Strategy details further the range of responses anticipated to give effect to this goal.

While the Council recognises the necessity of prioritising responses so as to maximise effectiveness, we suggest that the more holistic response implicit in this goal as compared to Goal 1 is as equally a valid response for those species managed under Goal 1 as it is for those under Goal 2.

Auckland Council's own Threatened Species Programme manages 41 regionally (and some nationally threatened species) across the majority of taxa.

Nevertheless, while other agencies including Auckland Council can and do have active threatened species programmes that supplement DOCs work programme and contribute significantly to the achievement of Goals 1 & 2 of the strategy, and recognising that resources will always be limited, the Council urges the government to better resource DOC to achieve these and other conservation national priorities.

In particular, we seek that DOC address more species under Goal 2. Notwithstanding the importance of engaging the wider community in all aspects of conservation and biodiversity management, it is this Goal which encapsulates the core function of DOC in

developing and implementing comprehensive species recovery programmes, and the Council considers resourcing should be increased to provide for more of these programmes to be successfully undertaken.

The Council would like to work with the Department to explore how we can support the achievement of these goals in Auckland. We would also like to identify how we can better align priorities, including through the work undertaken by our Local Boards for and with their communities.

### **Goal 3 – Integrate Te Ao Māori (the Māori world view) and mātauranga Māori (Māori knowledge) into species recovery programmes by 2025**

The Council is supportive of this goal, and agrees that the integration of Te Ao Māori and Mātauranga Māori with conservation programmes has the potential to both improve outcomes for native species, and support Māori in their role as kaitiaki of the living taonga of NZ.

However, while the Council recognises the role of Mātauranga Māori in the NZ Biological Heritage National Science Challenge and acknowledges the discussion of Ngā Whenua Rāhui covenants, the Council considers that there could be greater guidance about how this goal will be achieved.

The strategy could usefully outline the approaches that will be used, such as how successful partnerships with iwi and hapū will be established and resourced, some examples of how Mātauranga Māori will be incorporated into programmes, and perhaps a recognition of the potentially significant role treaty settlements can play in supporting Māori as kaitiaki.

### **Goal 4 - Support research, particularly through the National Science Challenges, that helps us to better understand data deficient species.**

As outlined above, the Council is supportive of the emphasis in the strategy on research across the range of species biology and conservation issues. We agree that increasing our understanding of currently data deficient species will support improved management.

The Council considers there must be sufficient resources to both undertake this research, and to act on its findings.

## **4. The Right Tools for the Job**

This section of the strategy outlines the range of tools identified as contributing to the achievement of the strategy goals, and the Council is generally supportive of these tools.

Below, we highlight some of the ways that Auckland Council uses or contributes to the use of these tools, including in conjunction with the department and others. We also make some suggestions as to how their use in Auckland and elsewhere could be improved and better reflected in the strategy.

**Recovery planning:** The Council supports the moves to develop a broader range of recovery groups, focused on harnessing expertise to develop response programmes for more species than in the past. Such cooperative approaches are critical to the delivery of effective and integrated programmes.

Several Auckland Council officers participate in these groups enabling their expertise to be drawn upon, as well as helping increase the degree to which our own work can successfully integrate with that of the department.

**Prioritisation of species recovery:** The Council has followed a similar approach as the department to the prioritisation of species and ecosystems for management purposes.

We encourage the department to work with the Council and all other players to increase the consistency of approaches across all areas of biodiversity and conservation management as they are developed.

**Captive management:** This is a sad necessity for many of our threatened species. The Council is very supportive of the involvement of the Auckland Zoo (an Auckland Council facility) in this aspect of species management, and in the veterinary services that it can provide to native species from the wild or sanctuaries.

**Fenced Sanctuaries:** Auckland Council is proud of its several 'open sanctuaries' which support a range of nationally and regionally threatened species. They enable the people of Auckland and visitors to interact with rare species while delivering real conservation outcomes. We work collaboratively with the department in the management of these sanctuaries, but would like to explore ways in which this relationship could be even more effective. (See also the discussion below in relation to translocations.)

**A partnership with the Botanic Gardens Australia and New Zealand:** The Auckland Botanic Garden is an Auckland Council facility, and the Council is very supportive of this initiative. We note that the Gardens are providing some additional feedback to the draft strategy, with which we agree.

**Seedbanking:** The Botanic Gardens can play a significant role in the ramping up of seedbanking, and this will no doubt be developed under the partnership model discussed above. However, currently this is significantly underfunded and more resources are required if this is to be successful.

**Biocontrol and Biosecurity:** The Council agrees that these aspects of pest management are critical components of indigenous biodiversity protection and enhancement. The Council is very active in biosecurity initiatives, including several successful uses of biocontrol approaches in Auckland.

**Translocations:** The Council has worked cooperatively with the department to successfully translocate several threatened species, into and from parkland in Auckland. This has enabled the Council to make a meaningful contribution to the conservation of species such as kōkako in the Hunua and Waitakere Ranges, kiwi in Hunua Ranges,

Shakespear and Tāwharanui Regional Parks and takahē in Tāwharanui Regional Park. There is also an increasingly synergistic relationship between the DOC sanctuary on Tiritiri Mātangi Island, and the nearby Shakespear Regional Park that illustrates the potential of cooperative approaches in ramping up successful outcomes.

Nevertheless, the Council has sometimes encountered unnecessary hurdles in the translocation and handling of threatened species. We have several acknowledged national experts on staff involved in our threatened species management, but they are sometimes hampered in their work by the requirements to get handling permits causing unnecessary delays and obstacles. Additionally, our applications for translocation are handled through the Hamilton Office and we have found this can cause delays, sometimes caused by a lack of understanding of the Auckland situation or what appears to be a lack of staff capacity for processing applications.

Improving the management of translocation and handling of wildlife and plants is one area we see a specific opportunity to improve our collaboration with the department and would like to see a shift towards recognising the Council as a trusted partner rather than an applicant. (See also below for discussion of this in the RMA context.)

**Regulation:** The Council agrees that regulation is a critical tool in the protection and enhancement of populations of threatened species. We agree that “[a]ppropriate legislation protects species and their habitats, and grants managers the necessary powers to mount recovery operations or act promptly against new threats.”

However, in our view, this discussion downplays the existing and potential role of legislation and regulation in protecting biodiversity, including on private land.

The Council’s primary RMA tool is its Unitary Plan, and in this the Council has introduced comprehensive protection of significant<sup>2</sup> indigenous biodiversity in Auckland, in both urban and rural environments (~3300 Significant Ecological Areas covering ~80,400 hectares).

This regulatory approach is a critical component of the Council’s biodiversity approach, and both provides some protection of areas, including those known to be habitats of regionally and nationally threatened species and informs decisions made about the location and nature of active management (undertaken and/or supported by the Council).

The statement that “[p]resently there are limited powers in the legislation to protect biodiversity on private land without the owner’s agreement...” does not adequately reflect the role of the RMA.

Nevertheless, the broad focus of the RMA on sustainable management means that tools such as the Auckland Unitary Plan seldom direct absolute protection of biodiversity, even if biodiversity values are known to be high.

---

<sup>2</sup> The Significant Ecological Areas overlay in the Auckland Unitary Plan, which identifies areas considered significant in terms of section 6(c) of the RMA.

Notwithstanding the declaration in section 3 of the Wildlife Act that [most] wildlife is “absolutely protected throughout New Zealand”, the lack of protection of habitat under that Act, and the difficulties in establishing strong protection under the RMA means that this is simply not true. Even if areas are identified as significant, and therefore with some degree of protection, the presence of threatened species does not automatically mean that its habitat will be protected, even though it will likely be a factor in decision making. And if the species is found outside of an area protected under the RMA, it is extremely difficult to require any kind of response – either to protect the habitat of wildlife or to move it somewhere safer. We agree with the second half of the statement quoted in part above that a lack of legislative mandate “... can be problematic if urgent action is needed.”

In the Council’s view some strengthening and clarification of the intersection of the Wildlife Act and the RMA, would be appropriate. For example, the Wildlife Act could “talk” directly to the protection of habitat as a necessary component of protecting wildlife, and directly afford that protection, and/or mandate its protection under the RMA. This protection would necessarily be stronger for habitats of threatened species.

The Council wishes also to highlight another administrative problem it sometimes encounters with the department. Namely, in situations where habitat loss is occurring (as a permitted or consented activity under the RMA), there can be unnecessary obstacles to the successful translocation of native wildlife from areas where their habitat is being destroyed. Frequently, these can be very time critical situations, and more streamlined processes are required. This is another area we would like to progress with the department.

The discussion in the strategy also correctly identifies the lack of specific legislative protection of plant species, including threatened species. Our comments above in relation to the difficulties of protecting the habitats of threatened wildlife are also relevant to plants. For plants, this is compounded by the fact that many threatened plant species favour disturbed habitats, which may exhibit few other evident biodiversity values.

The strategy could signal an intention for legislative anomalies and deficiencies to be addressed.

## **5. Myrtle Rust**

Finally, we sadly note that the discussion of myrtle rust is now out of date, and needs to be amended to reflect its presence on the mainland of New Zealand.

This is a reminder of the dynamic nature of the threats facing our native taonga, which the strategy is seeking to address.

Thank you for considering our feedback and we look forward to seeing how the Strategy will improve the outlook for threatened species.