

# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

[REDACTED]

Organisation name:  
*(if on behalf of an organisation)*

Email:

[REDACTED]

Signature:

*(we accept a typed signature if  
no electronic signature)*

[REDACTED]

## Submission:

### You can answer all or some of the questions.

1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?  
In part. There does not seem to be much new here, which strikes me as an opportunity missed. The most important aspect is the expansion of the number of species DoC is planning to actively manage in the next 8 years. Where will the resources for this expansion come from? This question must be answered, or else this document is simply an empty promise.
2. Are there additional aspects that you think should be included in the vision?  
The Vision seems rather limited, focussed on the terrestrial, and within that on forests. There is nothing in the second paragraph of the page 4 Vision about any marine or freshwater initiatives. Indeed, the whole document is rather light on the marine; wetlands (swamps, etc.) and lakes seem to have been almost totally ignored. In general, I think there needs to be more emphasis on and acknowledgement of the importance of habitat conservation, even though I understand the focus of this document is species conservation. As is mentioned in the document, habitat conservation can conserve many, many species. After all, getting rid of predators is in many cases habitat conservation that benefits species.
3. Do you agree with the characterisation of the value and current state of our native species?  
The document rather glosses over whether or not current efforts are sufficient for recovery (e.g., Maui's Dolphin, where there is no evidence of a recovery so far), not to mention cases where our current efforts to mitigate pests and pollution are clearly insufficient (e.g., in controlling wilding pines and improving the quality of freshwater). Is there evidence that the sea-lion exclusion devices (page 38) work well? Perhaps most worryingly, there is no mention of threats to our invertebrate fauna like invasive ants. Ants are a very difficult threat to control, but we know scarily little about their effects of our native fauna (even though overseas studies suggest they can be calamitous). In summary, I think the characterisation gives a more optimistic view than is warranted, and there is insufficient acknowledgement of major gaps in our knowledge (we are not just ignorant about data-deficient species) and how these gaps may involve some significant threats to our fauna and flora.
4. Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?  
No. There is (almost) nothing here about two essential tools. The first missing tool is the management of the genetics of threatened species. For example, the use of genetic techniques is critical to the long-term survival of these species that the worst effect of inbreeding are avoided. Ironically, the importance of genetic tools is acknowledged on page 34 in the context of kākāpō, but somehow this recognition has not made it to the section on tools. How can this tool be ignored some ten years after Ian Jamieson pointed this issue out and then spent the rest of his life working with DoC to incorporate such tools into species recovery plans, etc.?! This omission is, to be frank, embarrassing.

The second missing tool is a possibility for the future: genetic techniques (such as the well-publicized gene drive) that might be used in eliminating predators (not just mammals, but invasive insects like wasps). Once again, it suggests to me that there is insufficient wider thinking going into the planning process here. Instead there is a tendency to talk only about business as usual.

5. Are there other tools we could use to help us achieve the vision?

Yes, see my response to Q4.

6. Will the proposed goals help us achieve the vision and assess our progress?

Yes, but I think they do not go far enough. For example, it is a worthy goal to increase the number of species managed for protection and to enhance the populations of some threatened and at-risk species. But, really, we should be aiming for a reduction in the number of threatened and at-risk species because we have instigated programmes that mean they can thrive without further intervention. We should be aiming for the long-term sustainability of our currently threatened species.

I am also puzzled that research of the National Science Challenges should be singled out for particular support. Why? Surely the research that best answers the questions should be prioritized; I am puzzled that one possible agency should be favoured.

And while I agree that understanding data-deficient species is something science can and should help with (and is a very worthy goal), why is that the only time science makes it into the four goals? Surely science can help with all of them. For example, Goal 2 could read, "By leveraging scientific evidence, enhance the populations of 150 prioritised threatened and at risk species by 2025."

7. Are there alternative goals that you think will better achieve the vision and assess our progress?

See answer to Q6.

8. Have we identified the right strategic themes?

I think the "Uniting against invaders .." is a good theme, but it needs to acknowledge more clearly, that these invaders are not just small mammals. This issue comes up only in the very last sentence, where browsers, weeds, invertebrates and pathogens are mentioned. I think this broader view should be more up front, with the subsequent focus on small mammals being an example and making it clear that getting rid of small mammals is just the first step on the way.

"Management at scale ..." is also a useful theme. It would be better, though, to see that this scale might include a variety of habitats, even to the extent of going all the way from mountains to the sea. I note again the emphasis on the terrestrial.

"Building our science and knowledge base" looks great. I am pleased to see that this base will be used to provide advice and that it will be open.

I think the wording of the "Focusing beyond public ..." theme is wrong. DoC seems to have rather limited resources already; how can they then *focus* beyond the DoC estate? I agree that private and Māori landowners have an important role to play, but it should not be the focus of DoC's efforts. Maybe something like "Acknowledging the importance of conservation outside the DoC estate" would be better.

Alternatively, I would prefer that the last two themes, this one and "Working together ...," were combined, as they are really about the same issue, namely, that this is not just about DoC resources being expended on the DoC estate.

9. Do you agree with our top 10 actions?

Well, with some, yes; with some, no. Action 2 need not focus the science through the Biological Heritage Challenge. I do not see why DoC should be favouring one provider of research over another. It should be the science that matters, not the provider. But the focus on the Conservation and Environment Science Roadmap is good. I strongly support the continued efficient use of 1080.

But Action 2 should also include something explicit about moving beyond mammalian predators, dealing with invasive insects, plants, pathogens, etc.

Action 3 is urgent (and a little late, apparently, given the recent arrival of myrtle rust).

Action 4, too, is urgent, but how will DoC strengthen NZ's biosecurity system? What influence does it have over another ministry, especially one with a rather different focus (namely primary industries)? How will success in this action be ensured? The response to myrtle rust doesn't suggest that DoC will be all that influential here.

I think Action 5 will be seen as a Trojan horse for weakening conservation outcomes.

The first part, about protecting marine ecosystems, is interesting given the relative paucity of discussion of marine protection in other parts of the document. Indeed, there is no discussion of this or related issues before this point in the document. In fact, I would ask why one of the bullet points is not something about ensuring a balanced representation of protected marine ecosystems? There is no marine reserve in the whole of Otago (or neighbouring areas), for example; why not, given there are a number of endemic marine taxa limited to Otago? This bullet point reads as if DoC is giving up on marine reserves, even though they have been wildly successful, and instead is retreating to a "more flexible" (= weaker) system of protection.

The second bullet point here (about the National Policy Statement for Indigenous Biodiversity) is fine, but I do worry about how the stakeholders in the Biodiversity Collaborative Group were selected. I know nothing about this and, as a practising scientist working on our biodiversity, I should. Again, will this work end up weakening conservation goals?

And why is there no mention of regulatory reform to protect biodiversity on private land, when this is foreshadowed on page 25? Such regulatory strengthening should be a bullet point.

Action 8 is a little problematic. How will the 500 be selected when for the most data-deficient groups, we don't even know how many species we have? I suggest that it would be better to focus on certain groups of poorly understood organisms, rather than the 500 species.

10. Are there any other actions that should be included, and any actions that should be removed?

In the Action about regulatory reform, there should be something about strengthening protection of biodiversity on private land. This is an acknowledged problem (page 25).

I would like to see some action about exploring the expansion of the number and size of marine reserves to better protect marine species hotspots. Maybe this could go under Action 7.

See also my answer to Q9.

11. Have we identified the right number of priority species? (This question could have a series of boxes for "too many", "about right", "too few" then a comments box underneath.)

Given the way in which protecting one species often results in the protection of others, because it is habitat that is usually conserved, I am fairly relaxed about this number. The expansion is good, but it is all a pipe dream without proper funding.

12. Have we identified the right priority species?

The list is very biased towards the charismatic vertebrates! I think that more balancing towards plants and invertebrates would be good, but given that many lower priority species benefit from protection of higher priority ones, I suspect it does not matter greatly.

13. Do you think other species should be prioritised ahead of the ones listed? And why?

Well, I would include more invertebrates.

14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

I hope not! I don't mean to be rude, but I think this document does not look forward enough. It is somehow not part of the vision that some species should have recovered and not need further protection. Just calling something a "Species Recovery Plan" does not do that; it should be explicitly articulated that the ultimate goal is that our flora and fauna will largely not need our active intervention any more. Moreover, as I argue in many places above, the document is missing vital elements, such as the use of genetic tools and knowledge, and misguided in emphasizing research providers over research impact and excellence. I think too that the plan is overly optimistic about the current state of affairs and it has undue emphasis on forests and forest species, neglecting wetland and marine species. And, finally, without increased resources for DoC (not just more sponsorship!), I think the framework is a rather empty exercise.

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*(if on behalf of an  
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## Submission:

### You can answer all or some of the questions.

1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025

Although I support the preservation of endangered birds and mammals, I worry that yet again the “fluffy & cute” species are getting the benefit of a strategy that is biased in their favour. I note for example that although the strategy discusses fungi, this life form doesn’t even make it onto the graph in the draft strategy, nor could I find any fungi in the 150 priority “species”.

2. Are there additional aspects that you think should be included in the vision?

Although volunteers and volunteer groups are mentioned on numerous occasions there doesn’t appear to be any mention of citizen scientists. Even in its most basic form (such as logging images into iNaturalist or Naturewatch NZ) I believe citizen scientists can play a significant role in reducing the “data deficient” knowledge gap. It seems self-evident that the data deficient knowledge gap is not going to be addressed by the very few professionals we have in New Zealand. If trained and assisted properly citizen scientists can play a vital role in obtaining the necessary data. See for example the marvellous work being done by the Ahi Pepe | MothNet project. See also this link giving some academic writing on the subject of Citizen science and conservation.

<http://www.sciencedirect.com/science/article/pii/S0006320716305730>

3. Do you agree with the characterisation of the value and current state of our native species?

If anything, I believe the strategy underplays the dire situation our endemic wildlife is in. The fact that such a large proportion of our endemic species are listed as “data deficient” is very worrying. Without data, we have no way of knowing how threatened they are. I worry most about those unnamed species which, without a description, are unable to garner the attention necessary for their survival. Taxonomy is a necessary first step in gathering the data needed to ensure all species are given the protection they need. Yet as emphasised by the Royal Society of New Zealand, New Zealand has too few taxonomists. DOC needed to work in partnership with other organisations to help resolve this issue.

4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

I generally agree with this section. I would like to state for the record I am a firm believer that 1080 should be applied over all public land managed by the Department

of Conservation. Given the scientific evidence of its effectiveness in pest control and the immediate benefits to biodiversity I support DOC in its use of 1080 and also any increase of the same. Control of possums, rats and stoats must be a priority, but hedgehogs, mice and wasps should also be controlled and where possible eradicated.

Ground work should also be laid for the education of the public when it comes to gene editing and CRISPA. Although this solution may be a long way off, without an educated public it is possible that this revolutionary technique may not come to fruition.

5. Are there other tools we could use to help us achieve the vision?

Backyard trapping groups appear to be springing up in every location. Urban areas can play a vital role in helping to preserve threatened species. The Threatened Species Strategy should encourage and support groups such as these. DOC should also be working in conjunction with City and Regional Councils to coordinate pest control as well as assisting with the provision and planting of species of plants that are under threat. Locally threatened species can be assisted by being planted out by conservation groups and encouraged in local gardens.

DOC should also be encouraging groups and individuals to undertake citizen science observation work, helping publicise the same. I believe outreach and encouragement of volunteers is a vital element of any Threatened Species Strategy as given its current funding DOC will be unable to do all the necessary work on its own.

I also believe there needs to be more emphasis on obtaining data. Without knowing what species are where, describing the same and the biodiversity they rely on we are attempting to save species with one hand tied behind our back. To help with this DOC should work with other institutions to obtain access to our biodiversity heritage. For example, Auckland Museum has digitised its natural history collections and has shared its data with GBIF (the Global Biodiversity Information Facility). This in turn informs scientists in their research and assists citizen science. In order to get the data it needs DOC should encourage other institutions such as Te Papa and regional museums such as Otago and Christchurch to share their natural history collection data.

As mentioned I also believe citizen science can play a vital role in helping DOC solve the “data deficient” issue with many of our endemic species.

6. Will the proposed goals help us achieve the vision and assess our progress?

I’m of the belief that The Threat Classification System is the best way to measure progress. I believe the moving of endangered species up towards the “not



threatened” classification is the best measure of whether a threatened species strategy is achieving its goals.

7. Are there alternative goals that you think will better achieve the vision and assess our progress?

8. Have we identified the right strategic themes?

9. Do you agree with our top 10 actions?

Yes. I like how specific they are. It makes working out whether they've been achieved or whether progress has been made easy. I particularly approve of DOC prioritising obtaining more data on 500 data deficient species. I believe DOC should work with the public via groups such as NatureWatchNZ as well as other citizen science initiatives to help assist with this.

10. Are there any other actions that should be included, and any actions that should be removed?

11. Have we identified the right number of priority species?

(Circle or highlight one)

• Too many

• **About right**

• Too few

**Comments:**

150 is a lovely number that makes for good publicity but the word “species” should be used correctly. This strategy identifies 150 species and subspecies for priority protection. I believe that to call it “150 species” is misleading and could lead to a publicity backfire as the word “species” isn't used correctly in the document. I realise this sounds pedantic but words do matter. It could be regarded as “cheating” if DOC is seen as saying they are protecting 150 species when in reality they are protecting 145. I recognise this is more of an optics issue, but I don't want DOC to have negative publicity where this is easily avoided.

12. Have we identified the right priority species?

I worry that there doesn't appear to be any fungi in the list. Surely this can't be correct. But not to have fungi represented in the “Number of Threatened Species By Broad Taxonomic Group” graph, let alone the priority list just doesn't seem right. Also, given the number of endemic snails and insects by proportion these life forms seem to be underrepresented. I recognise DOC has a fine line to walk. Getting the general public behind conservation of the Kaka or Takahe is easier than for a beetle or fungus.

13. Do you think other species should be prioritised ahead of the ones listed? And why?

We have so many endangered species in New Zealand. I think they should all be saved. If you have to prioritise aesthetically beautiful birds and dolphins in order to “sneak in” insects and fungi so be it. Save the ecosystem along with the glamorous species and hopefully those less attractive endangered species will survive as well.

14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

Taken together, I believe the framework will help DOC concentrate its limited resources in the areas it can have the most effect.

**Other comments:**

I am concerned about the misleading “Number of Threatened Species By Broad Taxonomic Group” graph in the strategy report. For example there are 1601 species of endangered or data deficient terrestrial invertebrates. However this column appears overshadowed by the bat column which deals with 4 species . As mentioned previously a whole kingdom of life, Fungi, doesn’t appear to rate even a mention. I believe the data in this graph needs to be presented in a more scientifically accurate and less biased manner.

**From:** [REDACTED]  
**Sent:** Thursday, 15 June 2017 4:43 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
Organisation:  
Email: [REDACTED]

- q1: Yes, definitely. A huge leap forward in terms of thinking, planning and action
- q2: I think strategy is thorough in its coverage and realistic in its goals. A solid start
- q3: Yes, pretty insightful for species I am familiar with
- q4: Yes i think so
- q5: Can't think of any but technological advances will answer this over your time-frame
- q6: Yes definitely
- q7: No
- q8: Yes, very thorough
- q9: Yes, absolutely
- q10:
- q11: aboutright
- q11comments:
- q12: On the whole yes - good mix ecologically, nationally and threat-wise
- q13: The list of 150 is a fine start, and relevant in the groups i am most familiar with. It is always arguable what to include but what you have done is a solid start
- q14: Yes, it is a brilliant start which together must build on, maintain and monitor

**From:** [REDACTED]  
**Sent:** Saturday, 17 June 2017 1:29 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]

Organisation:

Email: [REDACTED]

q1: Yes

q2: No

q3: Yes

q4: Yes

q5: Environmental groups such as Forest and Bird that have been working for many years to protect the environment and native species should be used as manpower.

q6: Yes

q7: Educate the community-in particular home owners about the biosecurity values in their communities.

q8: Yes

q9: Yes

q10: The war on weeds is very important. Communities need to be actively involved in recognizing and removing weeds that are a threat to native plant species which are a habitat for our threatened species.

q11: outright

q11comments:

q12: Yes

q13: No

q14: Yes as long as the population of New Zealand are aware of them and local councils implement them. Not just another report to be filed away.

20 June 2017

By email

Department of Conservation  
PO Box 10 420  
Wellington 6143

## **Re: draft New Zealand's Threatened Species Strategy**

Dear Sir, Madam,

Tourism Industry Aotearoa (TIA) is the peak industry body representing the tourism industry. We welcome the opportunity to comment on the draft Threatened Species Strategy.

Tourism 2025 ([www.tourism2025.org.nz](http://www.tourism2025.org.nz)), an industry-led, government supported growth framework was launched in New Zealand in 2014 and has set an aspirational goal of reaching \$41 billion in annual tourism revenue by 2025. **The industry's focus is on growing value faster** than volume. The Tourism 2025 Growth Framework is based around five key themes: Insight, Connectivity, Productivity, Visitor Experience and Target for Value. This framework was refreshed in 2016, refer ([Tourism 2025 - two years on](#)).

While the five themes of the framework remain unchanged, the emphasis in some focus areas has shifted. Sustainability is one of the themes now being given greater emphasis. There is a desire and expectation that long term economic, environmental, cultural, and social sustainability becomes a core value against which all decisions are being tested.

### **Tourism recognises the need for a Threatened Species Strategy.**

To ensure a sustainable future, the New Zealand tourism industry must ensure it is demonstrably committed to looking after all the resources it uses to operate. Sustainability must become a genuine ethical underpinning of the industry.

The New Zealand tourism industry is highly reliant on the environment in which visitors immerse themselves, whether this is air and water quality, forests, wildlife, or urban environments. The quality of how we manage our environment is inherently tied to the performance of the tourism industry in the minds of our visitors. As such, tourism must champion the interests of our environment **through its own conduct and by being a powerful voice in New Zealand's overall** management of its environmental assets. For example, there are genuine gains for tourism if we are looking after our endangered species and managing native landscapes e.g. through weed control, pest control, advocating for sustainable use, etc.

#### **TOURISM INDUSTRY AOTEAROA**

Level 4, 79 Boulcott Street, PO Box 1697  
Wellington 6140, New Zealand

**P** +64 4 499 0104 **E** [info@tia.org.nz](mailto:info@tia.org.nz) [tia.org.nz](http://tia.org.nz)

Strategic Partners  
supporting TIA and the  
tourism industry



We are pleased to see that there is a strong linkage of this strategy with other key initiatives such as Predator Free 2050 and Battle for the Birds. The approach feels coherent and mutually supporting. However, TIA is questioning though whether the recommendations from the Parliamentary Commissioner for the **Environment's report 'Taonga of an Island Nation: Saving New Zealand's Birds'** have been taken on board, particularly the recommendations around feral cats and around having a Plan of Action.

### **Conservation partners**

Although we understand that the draft Threatened Species Strategy is a Government – DOC document, we are of the opinion that this strategy is unnecessarily confined to DOC. There should be greater emphasis on how non-government partners, such as councils, land owners, NGOs, community groups, businesses, the New Zealand public and other partners that have an interest in working for conservation, can be part of the solution. What action could these partners undertake to support this initiative? It is unclear to us how this strategy will lead to a concerted push to ignite a groundswell of action and long term behaviour change within New Zealand.

It is disappointing that the draft strategy does not refer to the very positive contribution of tourism as a conservation partner. Neither does it mention the great potential to harness industries such as tourism to drive the strategy and to **play important roles in the strategy's implementation. Examples of what this** could look like for the tourism industry include: support of DOC programmes; adopting local or regional restoration projects; articulating the value of nature as a resource to be protected; and by playing a vital role in educating New Zealanders and people from around the world about the special nature we are restoring.

### **DOC's Commercial Partnerships Group**

TIA was surprised to see that the draft **Strategy does not refer to DOC's** Commercial Partnerships Group. The work of this group, responsible for driving growth in conservation through partnerships, is unique and important. Many tourism operators are keen to be involved with conservation work, but do not know what to do and/or how to do this. Enabling businesses to take action is **critical in achieving the 'all-in approach' that is needed to make real change.** In **TIA's opinion, this should** be one of the key focus areas of this draft Strategy.

## Comments on specific sections

### Page 3

In the section '*... the clear species goals set out in this Strategy will also guide decisions by...*' should include '*businesses, including tourism businesses*' as one of the bullet points.

The four Predator Free 2025-2050 goals are listed, and on page 5 the four Threatened Species goals are listed. These are different but related, and this is a little confusing for the reader. The flow from the Predator Free 2025 goals to the Threatened Species goals needs to be clearer.

The priorities in this Strategy should guide the strategies of other government departments including MPI.

### Page 4

**Second paragraph of 'Vision' - 'businesses, including tourism businesses' should be included (this applies throughout the document).**

Under Focus, it is **good to see 'Working Together in Partnerships', but this aspect is not built upon sufficiently through the rest of the document, especially from a tourism perspective.**

### Page 9

As noted, the priorities in this Strategy should guide the strategies of other government departments including MPI. This also means that government decisions need to align with this Threatened Species strategy. For example, granting consent for the water take through the Kiwi sanctuary south of Haast is out of step with this strategy.

TIA would like to see evidence that government strategies and decisions will be aligned with this Threatened Species strategy.

### Page 10

This section should include a section on the value of nature to tourism – species, landscapes, impact of wilding pines etc. Ecological degradation is a big downside for the tourism industry. Conversely, doing well has a big upside.

### Page 12

The figure on the number of Threatened Species seems to be incorrect. For instance, there are five bat species, three are threatened and one is **data deficient**. **This means the orange bar should cover 60% of the bar, and 'data deficient' 20%. Same for marine mammals, so it might be a method issues.**

#### Page 15

This is a good example of partnering with Fonterra. An example of the valuable role of a tourism partnership would strengthen the document. Air New Zealand would be a good example at a national level. There are also many regional and local examples to choose from.

#### Page 17

Again, should **include 'businesses, including tourism businesses'** in the sentence on partners.

#### Page 20

The Right Tools for the Job - this section would really benefit from examples of the role businesses and/or communities could adopt or local challenges they could take on.

#### Page 32

Again, there is real opportunity to highlight the positive role tourism is, and can, play as a partner in this section.

**Section 'Managing ecosystems at scale to protect species'** – The McKenzie Basin is a great example of the need to align this Threatened Species strategy with government oversight of the needs of threatened ecosystems. We suggest this example is included in the document.

#### Page 35

TIA supports the funding for science, but as noted in our [submission on the Conservation and Environment Roadmap](#), we are concerned that tourism is completely absent from any of the science initiatives within the 12 themes. As such, this Roadmap completely misses the stakeholder interest of the tourism industry and the government institutions that support tourism on how New Zealand manages its conservation and environmental resources, even though research consistently finds that these values are the very reason why people visit New Zealand.

#### Page 39

**Section 'Working together in partnerships'** – working with businesses should have a stronger **focus here, including highlighting the work of DOC's Commercial Partnerships Group** in enabling businesses to grow conservation.

#### Page 40

There should be an Action included in this section enabling the New Zealand public, including businesses, to take action to support this Strategy – a concerted push to ignite a groundswell of action and long term behaviour change in everyday New Zealanders.



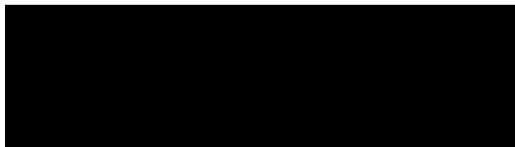
## **Conclusion**

TIA supports the development of a Threatened Species Strategy but is concerned the current draft is deficient in several areas. There are genuine gains for tourism if we are looking after our endangered species and managing natural landscapes. Successful outcomes from this strategy are very important to tourism sustainability. We are of the opinion that the strategy should have a stronger focus on working together in partnerships with tourism operators.

TIA wishes to participate further in any follow-up process, including any formal meetings and hearings, to ensure that the needs of the tourism industry and the potential impacts on tourism are adequately represented in the draft Threatened Species Strategy.

Please do not hesitate to contact us if you have any queries about our feedback.

Yours sincerely,

A large black rectangular redaction box covering the signature area.A short black horizontal redaction bar.A long black horizontal redaction bar.

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(if on behalf of an organisation)

Email:

Signature:

(we accept a typed signature if  
no electronic signature)

**Submission:**

**You can answer all or some of the questions.**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

*No There are 3000 species in New Zealand that are under threat.*

2: Are there additional aspects that you think should be included in the vision?

*Yes much more investment and focus on the marine environment.*

3: Do you agree with the characterisation of the value and current state of our native species?

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

Yes

5: Are there other tools we could use to help us achieve the vision?

*More widespread use of 1080. Better control of game species and strict water management regulations.*

6: Will the proposed goals help us achieve the vision and assess our progress?

*No. Doc only applies pest control to 20% of the land it manages.*

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

*100 percent pest control of all public conservation land.*

8: Have we identified the right strategic themes?

*Yes but what about our offshore marine environment? Is that adequately protected?*

9: Do you agree with our top 10 actions?

10: Are there any other actions that should be included, and any actions that should be removed?

11: Have we identified the right number of priority species?  
(Circle or highlight one) • Too many • About right • Too few

*Far too few.*

**Comments:**

12: Have we identified the right priority species?

13: Do you think other species should be prioritised ahead of the ones listed? And why?

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

15: Do you have any further comments regarding the draft Strategy that is not covered above?

*All forests need regular pest control.*

*DOC needs to spend less funding on tourism and more funding on protecting wildlife and habitats*

*The government is spending a lot of money bring tourists here ie 50 million at the DOHA expo but does not want to spend money on protecting our native habitats*

*We need more marine reserves*

*And we need also to focus on our marine mammals and sea birds*

**From:** [REDACTED]  
**Sent:** Friday, 23 June 2017 11:29 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]

Organisation:

Email: [REDACTED]

q1: Yes

q2: Don't poison our forests with 1080

q3: Yes

q4: No

q5: Have universities included in New ways of pest destruction instead of pouring countless millions of dollars on a poisoning operation that has not been working since its introduction in the 1950's

q6: No

q7: Yes, young fresh minds

q8: No

q9: No

q10: As noted above

q11: toomany

q11comments:

q12:

q13:

q14:

q15:

**From:** [REDACTED]  
**Sent:** Saturday, 24 June 2017 8:30 a.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]

Organisation:

Email: [REDACTED]

q1: No. I don't believe aerial 1080 poison has proved its worth and the indiscriminate killing of wildlife is unacceptable

q2: Kaitiakitanga would not include aerial 1080 poison drops as harm would be inadvertently caused to other areas not included in drop and animals not intended for

q3: No

q4: no to aerial 1080 dropss

q5: sanctuaries are working, land traps

q6: no

q7: sanctuary development

q8: no

q9: no

q10: 1080 aerial drops should be removed its been over a decade this has proved worthless

q11: outright

q11comments: say no to 1080 aerial drops

q12: all species are vulnerable at this point with 1080 aerial drops

q13: no

q14: unsure because the continued use of aerial 1080 poisoning is also polluting our waterways

q15: stop 1080 aerals drops you cannot gurantee the safety of our waterways, other mammals and habitat

**From:** [REDACTED]  
**Sent:** Saturday, 24 June 2017 9:52 a.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Name:** [REDACTED]  
**Organisation:**  
**Email:** [REDACTED]

- q1: Yes
- q2: Achieving the goals without cruelty
- q3: Yes but I believe 1080 is a major contributor to the problem
- q4: Definitely not
- q5: Specific pest targeted technology
- q6: Far better than the direction you are headed now.
- q7: Keep it clean and GREEN
- q8: I have to say no
- q9: Some not all
- q10: Cannot go back on phone to identify
- q11:
- q11comments: All species are important . Your 1080 policy is destroying the entire animal and microbiological system
- q12: Basically
- q13: As I said destroying a whole ecosystem is more destructive than selective control
- q14: No. You are repeating your questipns
- q15: Ban 1080.

**From:** [REDACTED]  
**Sent:** Saturday, 24 June 2017 11:17 a.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]

Organisation: Self

Email: [REDACTED]

q1: Yes, to a point

q2: Yes. Ecology before marketing.

q3: To a point

q4: No!

BAN 1080

BAN BRODIFICOUM

q5: Yes

q6: Doubtful

q7: Yes

Ecology!

Poisoning is NOT ecology!

q8: No

q9: No!

BAN 1080

BAN BRODIFICOUM

q10: Yes

BAN 1080

BAN BRODIFICOUM

q11: toomany

q11comments: BAN 1080

BAN BRODIFICOUM

q12: This is poorly worded. Many questions could be taken to apply to target OR protected species

q13: As above

q14: No.

For a start, possums and rats do not predate protected species under normal conditions.

From that point onwards, together with what we have been told by DoC, it is clear that these are just words.

Ecology is not achieved by poisoning. If you want to be the protector of our beautiful country, you've going to have to find an ecologically sound way to do it.

q15: Covered above, but I cannot overstress...

Poisoning is NOT ecology.

BAN 1080

BAN BRODIFICOUM.

These poisons are harm to the land and the water, they are indiscriminately and even a sublethal dose is harmful in the long term. 1080 affects birds, mammals, marsupials, fish, insects, and even earthworms. Brodificoum is significantly more harmful in the long term.

To my mind, the use of these poisons in such large quantities is not even sane, let alone acceptable.



[REDACTED]

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**From:** [REDACTED]  
**Sent:** Saturday, 24 June 2017 11:34 a.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]

Organisation:

Email: [REDACTED]

q1: No

q2: Yes

q3: No

q4: No

q5: Yes

q6: No

q7: Yes

q8: No

q9: No

q10: Yes

q11: toofew

q11comments:

q12: No

q13: yes

q14: no

q15:

**From:** [REDACTED]  
**Sent:** Saturday, 24 June 2017 11:52 a.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
Organisation:  
Email: [REDACTED]

- q1: No
- q2: Yes to not use 1080 brodifacoum in any program to eradicate pests at all. The use of 1080 is an unforgivable retrograde action for a so called 1st world government to take. Say no to 1080!
- q3: No I believe you are telling us the public lies.
- q4: Haha identified yes, but I disagree that the tools you have identified are morally bankrupt!
- q5: Yes by good old fashioned trapping crews you fools!
- q6: Bahahahaha! No! How? by depopulating all wildlife, poisoning our waterways, poisoning our domestic animals & poisoning our citizens! No!
- q7: Yes to manage pests by any means other than poison, namely 1080 brodifacoum!
- q8:
- q9: No!
- q10: Yes remove 1080 brodifacoum poison from your stupid pest eradication program now!
- q11:
- q11comments:
- q12:
- q13:
- q14: Bahahahaha! NO!
- q15: Say NO to 1080 BRODIFACOUM POISON DROPS NOW!

**From:** [REDACTED]  
**Sent:** Sunday, 25 June 2017 1:50 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]

Organisation:

Email: [REDACTED]

q1: No.

q2: Yes, rather a slashing of current strategies, than adding to them.

q3: All species are valuable, even some that have the name of "pest"

q4: No. You have identified tools that will accelerate the demise of some iconic species.

q5: Yes. Again, tools to get rid of, more than new tools.

q6: No.

q7: Yes

q8: No.

q9: No.

q10: The one key action to be removed is so glaringly obvious I can't understand why you can't see it. You have had 60 years to see that 1080 is a native bio-diversity disaster. 1080 has killed more native birds than any rat plague. 1080 has caused the rat plagues that trouble you lot so much. We are 5 years away from our next avian extinction and you are so blind you refuse to see 1080 is the cause. PLEASE cease using 1080, stop worrying about possums, the fur industry will control them. Trap trap trap is the answer.

q11: toofew

q11comments: All species including us are in mortal danger with the continued use of 1080

q12:

q13:

q14: No, not without ending 1080 use

q15: Stop using brodifacoum, it's worse than 1080

**From:** [REDACTED]  
**Sent:** Sunday, 25 June 2017 9:12 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
Organisation:  
Email: [REDACTED]

- q1: No
- q2: No 1080
- q3: Ban 1080
- q4: 1080 is Poison
- q5:
- q6:
- q7:
- q8:
- q9:
- q10:
- q11:
- q11comments:
- q12:
- q13:
- q14:
- q15:

**From:** [REDACTED]  
**Sent:** Tuesday, 27 June 2017 9:16 a.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]

Organisation: [REDACTED]

Email: [REDACTED]

q1: Yes, I support the proposed vision as long as government is prepared to provide sustainable funding for DOC's requirements to achieve these goals.

q2: There was one very glaring omission in the document: No discussion or vision statement on the a wildlife health strategy for New Zealand. Wildlife health underpins the entire basis of the vision achieving success. Yet it was completely ignored! DOC has long been under resourced in its in-house veterinary abilities to assess and manage disease monitoring and establishing prevention strategies. This must be remedied soon to have a viable vision. Having sufficient biology expertise is critical; but in parallel, DOC need to have equal competency in wildlife health resources.

q3: Absolutely agree as I do not think it has been valued sufficiently as New Zealand's "Natural Capital"...which is often overlooked and under appreciated. We often only hear government speak of economic capital and performance. The 'clean and green' image of NZ deserves more than lip service to its "Natural Capital" advantage. The spin off to NZ in being seen by the world as preserving its natural heritage has enormous reputation value that carries economic benefits as well in terms of tourism and NZ's 'street cred' in environmental issues such as climate change.

q4: Not entirely. It needs to have a specific reference to the support and financing of a viable wildlife health strategic plan and competent resources. These are glaring omissions in the vision plan and must be corrected for this plan to have credibility.

q5: As mentioned in #4. A complete wildlife health programme bringing in NZ's network of wildlife health specialists (Massey University's Wildbase, Wellington Zoo, Auckland Zoo) plus DOC having sufficient in-house veterinary support to create a comprehensive national wildlife health strategy and be able to have the veterinary talent to manage the wildlife health plan. Otherwise, DOC will be continually faced with the prospect of having to always deal with disease issues on an ad hoc basis rather than having a preventive health programme actively engaged on a day-to-day basis with monitoring and improved preventive measures.

q6: I think so as long as government is prepared to invest in the vision's mission on a sustainable basis. We could have used the \$25 million that went for the flag referendum for ensuring our wildlife vision has sufficient funding.

q7: Yes, wildlife health strategies need to be at the top of the list to ensure the balance of the vision can succeed.

q8: Not entirely as previous points have been made. Start with a wildlife health strategy and the other themes fall into place. With omitting wildlife health in the vision, the vision will fail.

q9: Yes, by and large as long as you start with a new #1 which focuses on ensuring New Zealand has a competent wildlife health strategy and resources to achieve a high level of disease prevention and monitoring for threats.

q10: Keep the actions but add wildlife health strategy and competent veterinary resources as #1.

q11: toofew

q11comments: As above comments.

q12: Yes, endangered species have to have priority but there is a need to "lift all boats", ie ensure other species are not ignored.

q13: No. I agree with the list.

q14: Yes.

q15: No further comments other than I hope you will take my prompting seriously to add a strong vision statement and actions to develop a comprehensive strategic plan to deal with wildlife health. If you look at it in human terms in

NZ where we put a premium on public health strategies to maintain a viable society. That same view needs to be incorporated in this vision. Thank you for listening.

**From:** [REDACTED]  
**Sent:** Tuesday, 27 June 2017 1:49 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Name:** [REDACTED]  
**Organisation:**

**Email:** [REDACTED]

q1: No you are killing wildlife with your disgusting posion 1080

q2: Get off your asses and do some real work stop being lazy. Covering the forests tree tops and forests floors with 1080 is killing everything bee's the tree's and micro organisms we can not see.

q3: You have been dropping 1080 for quite a number of years now our endangered species are in real trouble. 1080 is clearing not working. You are the problem

q4: Get people on the ground if you can spend billions of tax payers money on 1080 you can pay people do do the job the right way. It will give people jobs and get them out in nature.

q5: Bounty on the heads on these so call pests

q6: No you are killing what you are trying to save with your toxic chemicals

q7: Outlined above

q8: No

q9:

q10:

q11: toofew

q11comments: Ban 1080 is disgusting cruel and inhuman

q12: The ecosystem works where it feeds from others all doc is doing is killing our ecosystem

q13: Yes because all life will be affected from 1080

q14: No

q15: Ban 1080

**From:** [REDACTED]  
**Sent:** Tuesday, 27 June 2017 3:06 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Name:** [REDACTED]  
**Organisation:**

**Email:** [REDACTED]

q1: The plan is good but the execution is all wrong

q2: More research into the impact DOC and other organisations are having on the environment without the broad spectrum guesses and averages

q3: No not at all I think your figures are flawed and under researched

q4: Definitely not, any tool that risks the lives of the animals, creatures and life you are trying to protect is not only flawed but fundamentally wrong and not the actions of a conservation group but that of an organisation that is just out to save money and do the job as cheap as possible.

q5: Any other tool is a better tool if it doesn't risk everything you are trying to achieve

q6: Not at all, without proper monitoring by third party independent organisations there will never be a proper assessment

q7: These goals should all be based on proper, validated peer reviewed scientific research that proves without a doubt and with no guessing and average assessments

q8: Based on flawed research and biased opinions definitely not

q9: Some of them

q10: Scientific research and proper studies not guesses and biased opinions

q11: aboutright

q11comments:

q12: Yes

q13: I think they all need to be protected but we can't do them all at once and you have to start somewhere

q14: It's definitely a starting point

q15: I think the whole thing is set up to confuse and justify the systematic poisoning of millions of hectares of native New Zealand without the proper peer reviewed science and studies and also think these actions are not only disgusting but certainly not the actions of a conservation group, doing things because it's cheaper or easier certainly would not bear weight in any other industry or sector so I don't understand how you feel it's right here, the total disregard for the safety and well being of these species and New Zealand citizens and visitors is utterly disgusting and incomprehensible, I also think that no one will take any notice of this form and it will amount to nothing but you trying to justify the use of cheap application of poisons,



**From:** [REDACTED]  
**Sent:** Tuesday, 27 June 2017 8:59 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Name:** [REDACTED]  
**Organisation:**

**Email:** [REDACTED]

q1: NO

q2: STOP using 1080 and poisoning everything, including the animals you are supposed to be taking care of !

q3: NO, you wouldn't be killing them, if you valued them

q4: NO

q5: quick kill trapping, ditch the poison

q6: NO

q7: YES, look at the whole ecosystem instead of just pocketing hundreds of thousands of dollars to use poison that is keeping a certain few well off financially

q8: NO

q9: NO

q10: Stay away from private property or you will be taken to court and it will be the END of DOC

q11: toofew

q11comments: STOP 1080 poisoning

q12: it should be about the ecosystem as whole..not pieces of it

q13: how about just making sure you don't ones like keas to start with???

q14: NO

q15: DOC is an embarrassment



PO Box 15-668, New Lynn, Auckland 0640

John Edgar ONZM  
President WRPS  
PO Box 15668  
Auckland 0640



3 July 2017

Department of Conservation  
[threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

### **Draft Threatened Species Strategy consultation**

I am writing on behalf of the Waitakere Ranges Protection Society (WRPS) to submit on the draft Threatened Species Strategy (the Strategy).

#### *Background on the WRPS*

The WRPS was incorporated in 1973. Its purpose is the conservation and protection of the Waitakere Ranges and to oppose any activity that may threaten or adversely affect the natural environment in the area, including the coastal and marine environment.

WRPS and its members are strong advocates for the conservation and protection of the natural environment of the Waitakere Ranges and WRPS was one of the key groups promoting the concept of the Waitakere Ranges Heritage Area (WRHA) for 35 years before it was achieved through an Act of Parliament in 2008.

#### *Comment*

Overall, we support the vision, goals, themes and actions laid out in the Strategy. We suggest that there needs to be a simpler vision, e.g. one sentence, that captures what we want to see in New Zealand. For example: Our threatened and at risk species will be on a path to recovery by 2025. While we are comfortable with the components of the vision outlined and accept the need to prioritise species, we would like to see a statement that the ultimate goal is for all species to be on the path to recovery so that we have no threatened or at risk species.

The tools outlined will support achieving the vision. However, we would encourage the use of mainland sanctuaries that are protected from predators by non-fence methods such as trap defence lines. These have been demonstrated to be able to keep predators at low levels, e.g. Ark in the Park in the Waitakere Ranges, while protecting native species. They are also more adaptable, enabling expansion or change to the area that is protected as resources allow.

This could link to an additional goal of identifying where there is limited habitat to support the priority species or groups of species and where additional safe, quality habitat could be developed. For example, the Waitakere Ranges are a prime location for mainland conservation of shorebird and seabird species due to the coastal forest habitat, which is underrepresented elsewhere in New Zealand.

However, the area as a whole is threatened by human disturbance, including cats and dogs, and predator control is ad-hoc, despite being extensive in some areas. A cohesive plan to protect and expand key areas of habitat, such as along the coast or areas with priority species such as kokako, would enable landscape scale conservation across the Ranges.

Another potential action is how to enable private landowners to do conservation – this will be increasingly important in areas where there are populations in areas such as the Waitakere Ranges that provide opportunities to conserve native species.

We support the other actions outlined and note that the action to seedbank at-risk species should prioritise those species at risk of myrtle rust.

We also support the use of 1080 as an effective and cost-efficient pest management tool. Given the risk of spreading kauri dieback with ground based control methods, aerial control including 1080 should be a priority for pest control, habitat restoration and the reintroduction of ground based species.

Finally, we support the number of species to be prioritised and have no comments on the list provided.

Yours sincerely

A black rectangular redaction box covering the signature of John Edgar.

John Edgar ONZM  
President  
Waitakere Ranges Protection Society

**From:** [REDACTED]  
**Sent:** Wednesday, 5 July 2017 8:48 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Name:** [REDACTED]  
**Organisation:**

**Email:** [REDACTED]

q1: No...your vision will guarantee the further demise of our native fauna (and other valued introduced fauna) because you want to keep using the broad spectrum non-biodegradable compound 1080

q2: Yes....the dis-continuation of 1080 and brodifacoum poisons

q3: All life is valuable.

q4: MOST CERTAINLY NOT. Continued use of 1080 and brodifacoum are the tools of extinction. Their use must cease immediately if iconic natives like the Kea are to exist in the wild in 5 years time

q5: Yes...trapping by experienced trappers, bounties on pests. But really , the vision is a pipe dream, an un-reality that is not even remotely achievable

q6: No. All the current "poison the hell out of everything and everywhere" mentality does is make a few in the trade wealthy at the expense of the natives and the NZ people

q7: Some real truly independent science and a bit of honesty would go a long way. You know 1080 is not working. Admit it, get rid of it and start actually thinking

q8: No...see above

q9: No...see above

q10: Remove 1080 and brodifacoum, introduce a bounty on stoats in particular, forget about the possums, leave them to the trappers to make a living from, stop the 1080 drops and the rat issue will subside. Your own data shows 1080 causes rat plagues after a drop...oh and stop telling lies

q11: too few

q11 comments: Stop poisoning people with your 1080 drops. Recover all dead animals before they get into the waterways and create e-coli and pollution issues, leave the iconic introduced game species for the hunters to control, stop lying to, poisoning and running rough-shod over rural people

q12: All species are a priority

q13: See above

q14: No...if you keep poisoning them they will soon be extinct

q15: In a recent doc survey, 62% of respondents said 1080 poison should be banned. For crying out loud, LISTEN TO THE PEOPLE THAT PAY YOUR WAGES, not the propaganda merchants (big poisoning businesses) that are lying to make fortunes and protect their filthy deceitful patch. Then maybe you can regain the respect of NZers

**From:** [REDACTED]  
**Sent:** Wednesday, 5 July 2017 10:10 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Name:** [REDACTED]  
**Organisation:**  
**Email:** [REDACTED]

- q1:
- q2:
- q3:
- q4:
- q5:
- q6:
- q7:
- q8:
- q9:
- q10:
- q11: comments: All I can say is that money is the bottom line, and you should focus on making the conservation of NZ's natural heritage as lucrative as possible. Even if it meant e.g. harvesting seeds or fruit from the bush to sell.
- q12:
- q13:
- q14:
- q15:



GHA Building, Ground Floor, 1108 Fenton Street, Rotorua 3010, Ph: 07 3463915

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Department of Conservation  
THREATENED SPECIES STRATEGY

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TE ARAWA RIVER IWI TRUST (TARIT) ENVIRONMENTAL STRATEGIC GOALS

Whakamarohitia Nga Wai o Waikato

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INTRODUCTION: TARIT has its genesis in the Ngati Tuwharetoa, Raukawa and Te Arawa River Iwi Waikato River Act 2010. The Trust represents the three Te Arawa River Iwi; Ngati Tahu-Ngati Whaoa, Ngati Kearoa-Ngati Tuara, Tuhorangi - Ngati Wahiao, who assert manawhenua kaitiakitanga, ahi ka and mana whakahaere over the Waikato River and its tributaries that run through it's rohe.

TARIT is committed to environmental sustainability and strategic goals:

1. Mana Tangata: Enabling our people to participate in the restoration and protection of the Waikato River, tributaries and environs.
2. Mana Taiao: Implementing measures to restore and protect the Waikato tributaries and environs.
3. Mana Matauranga: Upholding tikanga preserving wahi tupuna and enhancing matauranga of Te Arawa River Iwi.

Statement of Intent: It has been useful to assess the Department of Conservation, Threatened Species Strategy, against our environmental and fisheries plans, and TARIT supports its strategic goals alongside the Crown Accords, including the Conservation Accord in view of the proposed Threatened Species Strategy (pending feedback), which would include further and expected environmental analysis against our own plans, given our thoughts and top priorities are; the quality and restoration of the mauri of the Waikato River, cultural traditional sites, ground water and the development of land use affecting water.

We would like to remain updated on any progress or changes and if you have any queries please, direct these through to [REDACTED]

**From:** [REDACTED]  
**Sent:** Friday, 7 July 2017 8:38 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]

Organisation:

Email: [REDACTED]

q1: Yes but hope it can be reviewed regularly

q2: Yes. I was 4 years [REDACTED] for [REDACTED] THE forests both private and DOC are very damaged by deer and goats. 25 yr old covenants would typically be the same condition as newly fenced ones with only shrubby coprosma, blechnum discolor and a couple of other ground ferns unpalatable to these animals. This means no regeneration of Tawa or any other forest trees other than rewarewa in the understory and no wide range of species to provide bird food in the understory. Deer fenced covenants are spectacular in both Wairoa region and Gisborne Region. Wairoa as part of HERE has had intensive possum baiting around covenants as part of Ospri funding. Gisborne no funding and lots of possums so the real damage is the ungules present. Deer are so common in the farm landscapes flocks of 30 to 100 wild deer aer not uncommonly seen. Such that hunting them is no longer a challenge which has led to a massive rise in pig hunting and all the problems that brings. ANOTHER part of the problem is the extensive pine forests which have been locked up as private hunting grounds and have proved to be perfect deer breeding grounds.

q3: Yes

q4: As beow

q5: We need to get back the government funded hunters living in the back blocks as in the 1950 to 1970s. Otherwise our forest will die out, ask Professor Bruce Clarkson, Waikato Uni. These hunters could also help monitor the critical changes.

q6: Yes

q7:

q8: Yes

q9: Yes

q10: I think there needs to be paid community people to go support landowners. One farmer cannot do pest control on his land, it's too much to ask and you won't get engagement. Town people who volunteer have it easy as it can be a whole street sharing the trapping of a nearby forest.

q11:

q11comments: I think this should be a dynamic number so go with what you have now

q12: Yes

q13:

q14:

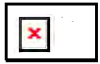
q15: Weka are an aggressive problem for other birds. There needs to be a policy on controlling them in certain areas. EG Ohiwa harbour bittern are being wiped out.

A policy on managing interspecies activity to protect vulnerable species.

**From:** [REDACTED]  
**Sent:** Saturday, 8 July 2017 1:29 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** STOATS !!!

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

After spending a lifetime working fulltime in Pest Destruction in NZ both self employed & on wages for the old Pest Destruction Board , I am convinced we must bring in an incentive payment for STOATS !! ///// We must stop the ' NOCTURNAL CLASH ' Stoats operate at Night so do KIWI ? they run into each other going along the runs ! //// An Incentive payment was used to control " Coypu " a large aquatic rodent ( from S. America ) that was wiping out the waterfowl Etc. , by the British M.A.F. //// You would implement an Incentive scheme in bursts ? ie during the Winter before Stoats switch to eating the more delish bird chicks & eggs ! //// Anyway we must use some " boot leather " & get stuck in with good operators ? as we are running out of time to save our Native Birds. ///// As for the Rats getting away ? with no Stoats , maybe a follow must be done on them as well . ///// Thanks from [REDACTED]



Virus-free. [REDACTED]





**From:** [Redacted]  
**Sent:** Wednesday, 12 July 2017 1:06 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [Redacted]  
Organisation: Manuhiri Kaitiaki Charitable Trust  
Email: [Redacted]

q1:  
q2: Engaging NZ public to educate and get them on board – best achieved through television

Use the public – put a bounty on mustelids/rats/hedgehogs/possums

Vision emphasises birds and weeds only. Should specify marine mammals, fish and freshwater species and invertebrates as well

q3:  
q4: Regulation could be used more often and strengthened however conservation efforts are often trumped by Primary Industry e.g. Maui’s dolphin and fishing/netting. Introduce cat licences (like Dog licences).

The use of partnerships could be strengthened. Target getting a major sponsor/partner for each of the top 150 priority species. Offer tax breaks on major sponsorships of 5+ years and public acknowledgement (TV)

Iwi need to be included in the consideration and decision making of biocontrols

q5: Collection of not only DNA but also gametes of our most threatened species e.g. Maui’s Dolphin, Fairy Tern

Is it possible to artificially inseminate or captive breed Maui’s?

Television awareness e.g. of Dirty Dozen

Involve the public e.g. to raise endangered plants in appropriate areas

q6:  
q7: Zero extinction of any species

Be the role model i.e. remove all pine trees off DOC land (e.g Kawau Island)

q8:  
q9:  
q10: Engage the public at a national level  
q11: aboutright  
q11comments: Not enough representation of marine fish, marine invertebrates  
q12:  
q13:  
q14:  
q15:

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Te Runanga Papa Atawhai O Tāmaki Makaurau  
Auckland Conservation Board

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Board File Ref: ACB-1950

12 July 2017

Threatened Species Strategy  
Department of Conservation  
PO Box 10420  
Wellington 6143

Email: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

Ko te Rangi e tu iho nei,  
Ko te Papatuanuku e takoto nei,  
Ko Tane Mahuta,  
Ko Tane te Wao Tu,  
Ko Tane Mataa,  
E nga Punaweko me nga Hurumanu, kei hea wo ake korihi o te hapara?  
Ka rango ki te po e!

### **Submission to Threatened Species Strategy**

The Auckland Conservation Board congratulates the Department of Conservation on the development of the first Threatened Species Strategy aimed at halting the decline in our threatened species and restoring them to healthy populations.

The Board supports the intent of the Department to be more strategic in addressing this large and important issue for New Zealand in a more structured and coherent manner. Most importantly, establishing some clear goals for increasing the number of threatened species receiving attention from the Department is highly desirable given the large number of populations of native species that are currently facing difficulties.

While the strategy establishes some broad goals to devote attention to specific numbers of species and “enhancing” populations of threatened species, in our view some clearer goals about what success looks like should be affirmed in the plan. Establishing secure and sustainable populations of targeted species that can be maintained without ongoing intensive interventions is the end goal, and some specific targets for numbers of targeted species transitioned to safety should be a core focus of the plan so that the future success of the strategy can be measured and publicised. New Zealanders are supporting this mission through thousands of volunteer hours, donations and taxes – they deserve to feel good about the successes so they continue their contributions.

**SERVICED BY**  
DEPARTMENT OF CONSERVATION  
TĀMAKI MAKĀURAU AUCKLAND  
Private Bag 68908, Newton, Auckland 1145, New Zealand  
Ground Floor – Building 2, 12-16 Nicholls Lane, Auckland Central 1010  
Telephone (09) 307 9279, Fax (09) 377 2919

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Te Runanga Papa Atawhai O Tāmaki Makaurau  
Auckland Conservation Board

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The strategy is powerful in that it provides an excellent summary of the current situation both in terms of the scale of the state of our native species, but also places the strategy in the context of the other current major initiatives in play, such as *Predator Free New Zealand*.

The Auckland Conservation Board has particular concerns for species within its geographic area of interest, including the Māui dolphin and fairy tern, both of which are in critical status and identified for attention in the strategy. This listing for attention is strongly supported by the Board.

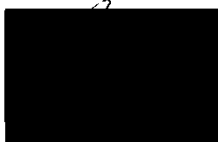
The “Top 10 Actions” identified in the Strategy are startlingly short of detail. For example, Action #6 identifies a need for freshwater reforms, but there is no detail of what is intended or required to make substantive progress. This is despite a large proportion of freshwater species, such as fishes, being identified elsewhere in the strategy document as being threatened and in need of attention. The continuing decline of our freshwater environments has been well documented and publicised recently, and the Department of Conservation currently manages the large-scale harvesting of many of these threatened species – such as all the whitebait galaxids listed identified in the strategy.

To be effective the “Top 10 Actions” need to be specific and provide target dates for delivery so that progress against these high priority specific action points can be assessed.

Finally, the draft strategy is short on detail on resourcing and how existing and new resources are to be applied to meet the strategic targets that are laid out in the strategy. This needs to be addressed in the revision to the draft document.

We are grateful for the opportunity to comment on the draft plan and we look forward to the final plan and further conservation success through its implementation.

Yours faithfully



**Chair – Auckland Conservation Board**

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TĀMAKI MAKĀURAU AUCKLAND  
Private Bag 68908, Newton, Auckland 1145, New Zealand  
Ground Floor – Building 2, 12-16 Nicholls Lane, Auckland Central 1010  
Telephone (09) 307 9279, Fax (09) 377 2919

**From:** [REDACTED]  
**Sent:** Wednesday, 12 July 2017 3:25 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Name:** [REDACTED]  
**Organisation:**

**Email:** [REDACTED]

q1: No, although the proposed vision is a good start, I would like to see more species managed for protection by 2025 and increased populations of more than the 150 threatened and at risk species prioritised.

q2: Management or conservation land and management of primary production land/oceans should not be totally separated. Many of NZs threatened species live in areas outside of conservation land so the way we treat these land systems is extremely important for biodiversity conservation. Encouraging landowners to increase biodiversity and be good caretakers of the land should be incorporated into this vision. Additionally, promotion of sustainable land uses is needed. There is should also be greater emphasis on improving and increasing habitat, rather than predator free - it would be much cheaper and have greater benefits overall.

q3: Yes, although greater understanding and acknowledgment of the extremely valuable services that biodiversity provides is needed - it is touched on but there is a lack of urgency on this situation. Without a healthy biodiversity, we are doomed and it will cost a lot to replicate these services.

q4: Needs to be expanded upon to achieve the vision. There is a lot of focus on pest species but more is needed on increasing habitat. See 5 for examples.

q5: Stronger regulations and protection. The Freshwater Fishery Regulations 1983, for instance, takes away all protection for all but one fish (an extinct one) if people want to eat or study them. Many of our freshwater fish can still be commercial harvested and there is no quota on how much is taken for some species, yet 74% are at risk or threatened with extinction. We should not be allowing the sale of threatened species. At least three species of fish that are on the priority action list can still be fished and of the whitebait species without a quota. To manage the conservation of these species, fishing must stop.

Water quality parameters in the Freshwater regulations should be based on healthy ecosystems so need to be much stronger to improve freshwater quality.

Greater emphasis on increasing native habitat and ecosystem protection. One of the greatest pressures is reduction of habitat so this must be addressed.

q6: As long as the goals are carried out. Therefore, more investment in protection threatened species is needed.

q7: Enhance and increase habitat for native species.

q8: The strategic themes sound nice but they all have to be utilised. More protection for threatened species on private land is needed - as outlined in the theme. Greater emphasis on including landowners in conservation on their land may help here e.g. diversifying land uses to accommodate both production and native ecosystems. This will excite land owners into wanting to protect these species on their own land.

q9: Some of them.

Number 6 I agree with as long as the freshwater reforms include strict and enforceable water quality standards based on ecosystem health limits and habitat indices, and not the ones that are currently in place – e.g. nitrate toxicity for species.

Stronger protection for species in regulations, e.g. freshwater fisheries regulations.

q10: Stop all commercial fishing of freshwater species and temporary bans on recreational fishing until further information is known about the population sizes and water quality, habitat, and populations are improving.

More no fishing marine reserves to increase protection for marine species.

Increase of habitat for all species should be added.

q11: toofew

q11comments: Can increase number of priority species if increase funding for DOC.

q12: Seems like a good selection of various species.

q13:

q14: It is a good start but it needs to be much stronger to safeguard our vulnerable threatened species. Progress reports are needed to measure if we are on task to achieving the vision.

q15:

# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter or contact person:	██████████
Organisation name: <i>(if on behalf of an organisation)</i>	
Email:	██████████
Signature: ██████████ <i>(we accept a typed signature if no electronic signature)</i>	

**Submission:**

**You can answer all or some of the questions.**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

*Yes, the desirable state for vulnerable and threatened species would be protection, which can only occur through partnerships between local and government organisations.*

2: Are there additional aspects that you think should be included in the vision?  
*no*

3: Do you agree with the characterisation of the value and current state of our native species?

*Within an ecosystem there are flow-on effects of events such as extinction. The extinction of an invertebrate can have drastic effects on higher species, such as birds, so it is important to consider the whole ecosystem rather than just individual species. It was well noted that Knowledge gaps is a major problem for the current state of our native species.*

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

*While all the identified tools are good, there is nothing relating to increased research effort for poorly studied species. After just discussing the consequences of this in the previous section (and having it included in the “goals” section) it would be nice to see how what tools are available to combat this and how research efforts could be improved.*

5: Are there other tools we could use to help us achieve the vision?

*See previous answer about increased research efforts. This could be achieved by providing more opportunity for post graduate students to investigate these data gaps. By allocating funds to support students researching data deficient species it will help both species conservation and students with their studies, as well as encouraging them to perform research in areas beneficial to conservation.*

6: Will the proposed goals help us achieve the vision and assess our progress?

*Yes, but while achieving these goals it must be ensured that current non-threatened species still be managed and assessed for population decreases (which may or may not be a result of other conservation actions). Currently non-threatened species must not be neglected.*

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

*Not particularly, but as mentioned above we must be aware of the ecosystem as a whole, and consider follow on effects of any conservation actions.*

8: Have we identified the right strategic themes?

*Yes. In particular it is important to consider areas outside of public conservation land. These areas tend to be overlooked in conservation efforts.*

9: Do you agree with our top 10 actions?

*yes*

10: Are there any other actions that should be included, and any actions that should be removed?

*no*

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • **About right** • Too few

### **Comments:**

12: Have we identified the right priority species?

*yes*

13: Do you think other species should be prioritised ahead of the ones listed? And why?

*no*

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

*Yes. I think the proposed plan takes into consideration many factors required to protect our threatened species, particularly including steps such as increased research effort, and community involvement.*

15: Do you have any further comments regarding the draft Strategy that is not covered above?

*no*



# New Zealand's Threatened Species Strategy: submissions for consultation

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---

### Submitter details:

Name of submitter  
or contact person:

[Redacted]

Organisation name:  
*(if on behalf of an organisation)*

Email:

[Redacted]

Signature:

[Redacted]

*(we accept a typed signature if  
no electronic signature)*



## Submission:

### You can answer all or some of the questions.

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

I think that the proposed vision is quite positive and may come across as feasible by 2025. However my concern is that in 8 years' time, will the number of species managed undergo a 40% increase to 500 species? Currently there are only 150 species identified. I understand that these are not the sole focus of the Strategy, however if the initial efforts and increased public awareness are on these 150 species, what will happen to those that are not on the list. I am merely speaking from a public viewpoint – say a naïve reader that may not care for species or birds that might not be on the list. From a conservation background, I am aware of other management efforts and projects in place (such as the orange-fronted parakeets)

2: Are there additional aspects that you think should be included in the vision?

There is some public involvement mentioned (such as the myrtle rust hotline), and education programmes are involved with awareness of species in decline. I think there could be an inclusion of 'what can you do'. This may perhaps entice the reader to become more active in the conservation scene, as one could perhaps read the Strategy, but then feel helpless, or may just accept that DOC, other communities, the Government etc are doing the work anyway.

3: Do you agree with the characterisation of the value and current state of our native species?

It's hard to 'agree' with the value placed on native species as the value of a species can be multifaceted. However I agree with the realisation that we have a right to restore as many species as possible and to help prevent the current declines of many species.

4: Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?

Recovery planning is probably the most important tool of them all, as it underpins the entire species project, and whether or not it is successful. I believe the tools outlined help to mitigate (bio-security, biocontrol, regulation, seedbanks) threats, increase genetic diversity and population densities (translocations, captive breeding), and create management protocols (partnerships, prioritisation) to successfully ensure the long-term vision.

5: Are there other tools we could use to help us achieve the vision?

I don't believe there are any other tools at this point in time. If education can count as a 'tool' then that may be a worthwhile inclusion. Education can help educate the public and increase awareness of the threats, what DOC and the government and the communities are doing, and how you as an individual can contribute to this vision.

6: Will the proposed goals help us achieve the vision and assess our progress?

Having quantifiable goals, such as 20,000ha successfully free of predator eradication, is useful to assess progress.

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

8: Have we identified the right strategic themes?

I believe the right themes have been identified, particularly with focusing beyond public land, that to be predator free by 2050, then all land needs to be accounted for. That also ties in with working together. Another theme I agree with is the building the science and knowledge base and realising that robust evidence is required to implement successful solutions.

9: Do you agree with our top 10 actions?

I agree with the top 10 actions, however is it Predator Free 2025, or predator free 2050? If it is both, then after the goals from predator free 2025 have been hit, then what will happen beyond that?

10: Are there any other actions that should be included, and any actions that should be removed?

With action number 8, there are many current NC, NE and NV animals that might not be data deficient that could benefit from further scientific work, as there is still a lot to learn about a species should management action should occur, and long-term monitoring on successful translocation or predator control effects is important to research scientifically.

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • **About right** • Too few

I believe, given the time frames stated that the number of species is about right. However without current strategies or projects in place for at least some of the other 350 species, the 500 species by 2025 may not seem achievable.

**Comments:**

12: Have we identified the right priority species?

I admit that my knowledge of plants and most invertebrates is quite limited, however have a preference towards birds. Within the birds, the right species have been identified. Of the 100 'threatened and at risk species', almost all the birds listed are shore birds.

13: Do you think other species should be prioritised ahead of the ones listed? And why?

I believe the orange-fronted parakeet should not necessarily be 'prioritised', but being nationally critical, I think it should at least be included on the list. My other query is with regards to the great-white shark. While not an endemic animal to New Zealand, is the reasoning for including it related to potential trophic cascades or changes in the ecosystem if it was to decline?

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

I agree that the proposed vision, themes goals and actions will set the groundwork for safeguarding the future for our vulnerable threatened species.

15: Do you have any further comments regarding the draft Strategy that is not covered above?

# New Zealand's Threatened Species Strategy: submissions for consultation

#30

## Once you have completed this form

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## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

---

### Submitter details:

Name of submitter  
or contact person:

[REDACTED]  
[REDACTED]

Organisation name:  
*(if on behalf of an organisation)*

Genesis Energy Ltd

Email:

[REDACTED]

Signature:

*(we accept a typed signature if  
no electronic signature)*

[REDACTED]



**Submission:**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

Genesis Energy supports the proposed vision. It is aspirational, but visionary and inspiring. The critical issue is how it will be effectively implemented in a practical sense and how the resourcing required will be secured.

2: Are there additional aspects that you think should be included in the vision?

The inclusive nature of the vision in terms of involving councils, philanthropists, communities, landowners, researchers and "others" should specifically mention business, as business could play a critical role in resourcing this strategy.

3: Do you agree with the characterisation of the value and current state of our native species?

Genesis Energy acknowledges the value and current state of our native species as set out.

4: Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?

Technology will prove the most important tool for species recovery in coming decades. This will not just be technology around detecting, attracting and killing pests, or detecting/monitoring threatened species, it will also include digital technology as a tool to inform and engage and increasingly digital society.

Without corporate partnerships, DOC will struggle to generate the resources needed to deliver the technology and hardware for field rangers, community groups, iwi groups and others, to effectively participate in delivering effective species recovery. The strategy fails to adequately recognise the vital role and importance of business/corporate partnerships as a tool for species recovery and the benefits they can bring to the table. DOC must become more receptive and responsive to the needs of business if it is to develop effective and enduring corporate partnerships for species recovery.

5: Are there other tools we could use to help us achieve the vision?

As above, business 'Partnerships' are a key tool. By understanding business drivers and therefore encouraging big business/corporate involvement, DOC will achieve win-win outcomes for conservation and business.

6: Will the proposed goals help us achieve the vision and assess our progress?

No comment

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

No comment.

8: Have we identified the right strategic themes?

Community engagement should be a key strategic theme. The task of achieving this strategy will require a 'whole-of-nation', national approach. Unless there is a nationally shared vision, many New Zealanders will remain unconnected to the outcomes being sought. Only by unleashing the energy, innovation and passion of all New Zealanders will these outcomes be realised.

9: Do you agree with our top 10 actions?

There are a range of public engagement actions that could significantly enhance the outcomes of this strategy. Developing wider, more effective partnerships is one of them.

10: Are there any other actions that should be included, and any actions that should be removed?

See comment in 9. above.

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right • Too few

No comment.

12: Have we identified the right priority species?

No comment.

13: Do you think other species should be prioritised ahead of the ones listed? And why?

No comment.

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

This is a very aspirational Strategy document that will require a whole-of-nation approach. Greater emphasis must be placed on community engagement, partnerships, building support and working together to achieve the desired outcomes.

15: Do you have any further comments regarding the draft Strategy that is not covered above?

No.

# New Zealand's Threatened Species Strategy: submissions for consultation

#31

## Once you have completed this form

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## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

[REDACTED]

Organisation name:  
(if on behalf of an organisation)

Hokotehi Moriori Trust

Email:

[REDACTED]

Signature:

[REDACTED]

(we accept a typed signature if  
no electronic signature)





**Submission:**

**You can answer all or some of the questions.**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

*Yes although we have big concerns about the imbalance of resources for our region (Chatham islands). We have more than 30% of NZs threatened species but only a small land area in DOC ownership and limited staff/resources. The island could achieve a predator free dream but only with local community effort and private landowner support. Move this element further up your vision list. We know that DOC will be aware that your vision is not possible without public support and private landowner buy in so better to articulate this more clearly in the strategy.*

2: Are there additional aspects that you think should be included in the vision?

*Greater emphasis on partnership required. Plus we note that Treaty partnership and reliance on traditional knowledge is one of the vision goals but we can't see how you will do this set out in the strategy.*

3: Do you agree with the characterisation of the value and current state of our native species?

*The strategy sets out value indications well esp regarding the current state of native species but does not give enough weight to 'island endemics'. Often we have very different indicators and also responses from species to island ecology – we can't be treated in the same way as the rest of NZ. The Chatham Island native flora and fauna is not specifically discussed. We have real challenges with resources, staffing and predator influence that can't be managed on Crown land alone. On the other hand the Chathams offers a lot of opportunity for conservation gain if we get sufficient resourcing and people power. More emphasis on island endemics needed.*

4: Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?

*The tools you have identified are OK but we have big concerns about reliance on local councils. The Chatham Island Council does no environmental work and has no funding for monitoring let alone proactive research.*

*Community groups and landowners are a vital tool – make sure this element is enhanced.*

5: Are there other tools we could use to help us achieve the vision?

*Explore how you can empower community groups and landowners to help. We have advocated for junior ranger programmes as one example. Identify local conservation heroes and have them assist with advocacy. This is particularly important for small isolated communities where there is often mistrust of outsiders.*

*We note that you have proposed a range of conservation tools and this is important but there should always be an emphasis on protecting and enhancing local biodiversity. Techniques such as captive management, growing plants from cultivars/cones etc are OK in special situations but will not help with long term viability of many species. We are forced to have some species on tiny island refuges because of predator problems – our goals should be to see species returned to their natural habitats and people ought to become ‘socialised’ to seeing this as the best option rather than conditioned to seeing species on offshore islands only.*

6: Will the proposed goals help us achieve the vision and assess our progress?

*The strategy acknowledges that communities have a part to play but please strengthen this. Please also review your tools around getting Councils on board – this will not work for the Chatham Islands.*

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

*The strategy needs to factor in conservation initiatives on our larger island ecosystems, and also take into account just how different these places are to care for compared with mainland NZ. The islands provide special opportunities for achieving a predator free status even ahead of the target dates. A stated goal should be predator free Chatham and Pitt Islands – not simply smaller off shore rocks and islands or nature reserves.*

8: Have we identified the right strategic themes?

*We think so but consider that community groups should be given more weight than the well funded commercial organisations like ZIP, NEXT etc.*

9: Do you agree with our top 10 actions?

Yes

10: Are there any other actions that should be included, and any actions that should be removed?

*The actions have not put weight on the huge value that remote islands can play in conservation initiatives. If Chatham and Pitt Islands were predator free a great many of the problems for managing threatened species would be removed and this, in turn, would change your management priorities for nearly 30% of the threatened species list. The strategy only looks at off shore nature reserves. A significant goal should be to eradicate mammalian pests from Chatham and Pitt Islands as soon as possible – certainly before 2025.*

11: Have we identified the right number of priority species?  
(Circle or highlight one) • Too many • **About right** • Too few

**Comments:**

12: Have we identified the right priority species?

*Yes though more emphasis on sea birds is important – only 7 are on your list*

13: Do you think other species should be prioritised ahead of the ones listed? And why?

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

Yes

15: Do you have any further comments regarding the draft Strategy that are not covered above?

*We think our responses above have covered our main comments. We have concerns that local community groups are not given adequate weight on the strategy.*

*We are also concerned that reliance on local councils will be mis-placed on the Chathams.*

*We note that the Chathams is not even mentioned in the strategy (apart from being the location for many of the species on the list). We should be featured in the strategy and used as an example of what can be achieved on human occupied islands – not just small nature reserves (which rarely provide for species well-being and genetic diversity). Nature reserves don't need help – the larger islands do.*

*We are also concerned that local DOC teams will have unrealistic expectations placed upon them to manage a large percentage of NZ's threatened species unless changes are made to increase funding/support. We strongly advocate for additional means of providing people-power for shelter belt planting, pest eradication etc. for example, we have a huge pest swan population. If we are successful in removing 100,000 swans we will need urgent help with planting riparian areas with native plants to prevent gorse incursion. An army will be required!*

# New Zealand's Threatened Species Strategy: submissions for consultation

#32

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Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
(if on behalf of an organisation)

Email:

Signature: Nimeshika Pattabiraman

(we accept a typed signature if  
no electronic signature)

**Submission:**

**You can answer all or some of the questions.**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

Yes, it does seem like an ideal situation for threatened as well as vulnerable species, but for an eight-year plan, it seems ambitious.

2: Are there additional aspects that you think should be included in the vision?

The basis of the Threatened Species Strategy could also focus on the marine and freshwater species. Additionally, I think it could include monitoring the current efforts (till 2025) as a part of sustaining the potential progress and efforts that may be applied.

3: Do you agree with the characterisation of the value and current state of our native species?

Yes.

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

Yes.

5: Are there other tools we could use to help us achieve the vision?

While introducing protection to species that currently don't have it is a good idea, it is important to make the laws more stringent. Fishing bycatch, along with affecting seabirds is a major cause of death of marine species- sealions, long-fin eels etc. Whitebaits being exploited affect more than one species needs to be controlled. Any actions affecting these collectively require more laws (punishable offences).

6: Will the proposed goals help us achieve the vision and assess our progress?

Managing 500 species- “a 40% increase from today”

- Relative to what? With the lack of knowledge about so many species, focussing our efforts on the remaining species. In the coming years, if we identify and gain knowledge on many of the remaining species, then the 40% mark is reduced.

“Long-term health of 150 species”. Improving a population's number does not guarantee health of the organism. When a species undergoes a severe fall in numbers and remains in that state for many generations, the genetic diversity is

greatly reduced. While the population numbers increase there is no guarantee of sustaining them or improving “health” of the population.

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

A major bridge to be crossed is keeping the public informed on current research findings. If we are to involve the local communities and non-scientific parties in protection of threatened species, then a level of transparency must be maintained on their level of understanding. Hosting regular talks, annual reports, improving education can be methods used.

8: Have we identified the right strategic themes?

Yes.

9: Do you agree with our top 10 actions?

Yes.

10: Are there any other actions that should be included, and any actions that should be removed?

Firstly, there is no mention of legal protection for freshwater bycatch which forms a major conservation issue especially for threatened/ endangered species along with protecting their environments/ habitats.

Secondly, the threatened species strategy considers 1080 to be a vital tool in predator control, but more amount of research needs to go into understanding its effects on other species of the habitat- either directly or by secondary poisoning.

Thirdly, as this is a large-scale plan, creating an alternate plan in case there is an issue with implementing any part/ action or if the proposed plan isn't effective in a particular region.

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • **About right** • Too few

**Comments:**

12: Have we identified the right priority species?

Yes.

13: Do you think other species should be prioritised ahead of the ones listed? And why?

No.

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

Yes, if all the actions stated are implemented, followed by regular monitoring efforts, it seems likely that the vulnerable threatened species can be protected.

15: Do you have any further comments regarding the draft Strategy that is not covered above?

In terms of funding, there is a possibility that when implementing the actions, the costs may go higher than estimated and plans cannot be abandoned midway so alternate plans must be considered.

# New Zealand's Threatened Species Strategy: submissions for consultation

#33

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

[REDACTED]

Organisation name:  
(if on behalf of an organisation)

Wildlife Ecology Group, Massey University

Email:

[REDACTED]

Signature:

(we accept a typed signature if  
no electronic signature)

[REDACTED]



## Submission:

### You can answer all or some of the questions.

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

The proposed actions outlined in the document are probably reasonable. The idea of desirable future state is difficult to assess, as the document does not give specific objectives or metrics, as would be normally expected in strategic decision making. I would rename the document as it does not explain the strategy underlying the proposed actions. However, it is an excellent summary of species conservation issues in New Zealand and the current state of play.

2: Are there additional aspects that you think should be included in the vision?

Yes, I would like to know what the overall objectives and what actions have been considered, and therefore how the proposed actions were strategically arrived at. And also who has been consulted in arriving at those values. It is great to see that social science has been used to assess the values put on species, but it would be good to know how this has been used explicitly.

3: Do you agree with the characterisation of the value and current state of our native species?

I think the document does a great job of presenting to current state of our species in a way that is widely accessible, and also does a great job of promoting the importance of species. However, I don't think it clear explains how different species are valued, and therefore is not an effective document for finding out whether people agree with these values.

4: Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?

Yes, in general, but the structure is confusing. I equate "tools" to management actions. It therefore strange that recovery planning and prioritisation are the first two items, as I would not call these management actions even though they are hugely important. It is also confusing that the key actions of weed and pest control are not included here, presumably because they are given a separate section at the top. This is a mistake in my opinion, as the objectives need to be established first before leaping into particular actions. The vital concept of habitat restoration is also not explicitly mentioned here at all – i.e. while weed and pest control (specific forms of habitat restoration) are mentioned, other types are not. The words "habitat restoration" only occur once toward the end of the document, and specifically with respect to fresh water.

5: Are there other tools we could use to help us achieve the vision?

As noted above, habitat restoration for terrestrial environments seem to focus almost entirely on pest control, and not mention other actions such as re-planting. Whereas pest control in freshwater and marine environments does not seem to be mentioned at all.

6: Will the proposed goals help us achieve the vision and assess our progress?

This is impossible to answer. My reading is that the vision is basically to achieve the goals, so it is a tautology.

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

Impossible to answer for the same reasons as above.

8: Have we identified the right strategic themes?

They seem reasonable, but I wouldn't use the term "strategic themes" since the strategy isn't explained.

9: Do you agree with our top 10 actions?

Yes, but I can't evaluate the rationale for them. It would be good to specifically include the word "wetlands" in these actions as well as the word "freshwater".

10: Are there any other actions that should be included, and any actions that should be removed?

I think it's reasonable, but worry somewhat that the only specific management actions are pest control and freshwater habitat restoration. While I agree these are the key actions, other species will need different forms of management action to persist.

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right • Too few

It is impossible to answer this question based on the information provided, as the number depends on the details of the prioritisation scheme and the budget. While New Zealand has led the world in working out how to answer such questions, the information is not provided here.

#### Comments:

12: Have we identified the right priority species?

Same as above. It is impossible to know whether the right species are prioritised without any information on the prioritisation strategy.

13: Do you think other species should be prioritised ahead of the ones listed? And why?

Same as above.

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

The meaning of this statement is unclear, so no comment is possible.

15: Do you have any further comments regarding the draft Strategy that is not covered above?

**From:** [REDACTED]  
**Sent:** Wednesday, 19 July 2017 11:19 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
 Organisation:  
 Email: [REDACTED]

q1: No poison 🙏 please don't use any death. Death is against life support and not a conservation of precious animals and birds.

q2: Please consider banning torturous animal deaths by poison and use all the budget on a second Zealandia sanctuary

q3: I love all nature all animals are created be God and deserve respect, all humans are in the process of learning plant based diet in the sinless diet of genesis. Animals are increasingly recognized as sentient intelligent emotional beings who deserve our love and protection in a great place where they can be fed and cared for

q4: No, please don't kill!! Encourage veganism, put down poison, stop fishing, each and every soul is valuable, we bought possums and ferrets here and now they are our children, we are responsible for seeing they get enough food they don't need eggs for breakfast.

q5: Mega beautiful natural aviary!! Bird hospital attached.

q6: The visions of poison are disgusting. Birds are not proven to benefit keas die. Poison kills frogs, bees, worms, fish, deer. It has no place in nz we're poison 🙏 we must change to non violence to every living thing feed the forests, remember fern gully?? How could you forget snow white?

q7: Looking after every animal, stopping blood shed for food, thus clearing our rivers and increasing our forests, better protection for everything

q8: No, superficial love for rare birds at the expense of all other life forms is not OK, especially when food water sanctuary can help birds and feeding animals can stop egg eating.

q9: No poison

q10: Sanctuary needs to be big bold beautiful huge enough to care for birds in adequate space to breed naturally. Possums can be given birth control vaccine invented in Australia and released outside sanctuary ground and given left over plant crops to ensure he gets adequate nutrition without animal protein

q11: toofew

q11comments: Go VEGAN and non violent strategies

q12:

q13: Marsupials, ferrets and all deer rabbits and every living thing is special

q14: Zealandia is only one mage sanctuary, build more

q15: Baby birds get killed alive by humans every day, boy chicks are egg industry waste. Start with non violent in diets, then tell me you really care about the spirits of the animals not just their pretty colors!!!

**From:** [Redacted]  
**Sent:** Thursday, 20 July 2017 8:59 a.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

[Redacted]  
Organisation: Hawke' Bay Regional Council

Email: [Redacted]

q1: The intent of the vision to safeguard vulnerable threatened species are relevant, but the strategy should identify how DOC intends to oversee the protection of the full suite of threatened species rather than just a subset.

q2: The draft strategy has big focus on terrestrial, and on species. It should address issues posing on other ecosystem domains (i.e. marine, freshwater) and also how ecosystem approach can complement the species protection - not just predator control but also from habitat restoration via creating connectivity/buffer etc. It is unclear how regional councils can contribute to achieve the strategy vision and goals.

q3: Good depiction of NZ endemism.

q4: Partnerships with regional councils are one of the most robust tools but this is not identified as a tool. RCs operate under RMA and Biosecurity Act and Local Gov Act which give RCs mechanisms to support and/or drive biodiversity outcomes. Such mechanisms compliment DOC's authority under their relevant legislation.

q5: Some economic tools such as Natural Capital accounting system should be considered. This may be in the form of payments for ecosystem services by "1.4 million international tourist" who will enjoy NZ nature (that includes biodiversity in urban areas).

q6: Accountability is unclear - who is responsible for each of the 10 actions in the strategy?

q7:

q8: We support the emphasis in the strategy on research aimed at improving our understanding of data deficient species to support more effective management. We also support focus on private land, however there should be more contents (and how-to) to this section, such as partnering with RCs, and other organisations who are able to actively engage with the community other than QEII.

q9: Browsers are a significant threat to ecosystems and native species, and needs to be addressed more in this document, including top 10 actions (or top 11 if needed). We support Biosecurity 2025 but the strategy does not clarify how this external document helps meet the strategy's goals and vision, nor any mention of MPI.

q10: • The draft strategy is silent on resourcing. Recognising that DOC's resources are already stretched we expect that either additional government funds will be provided, DOC's priorities will change to accommodate those set out in the strategy, or complementary resources are made available by other agencies. The approach to be taken should be clear.

q11:

q11comments:

q12: It is unclear how the goals for "500 species" and "600 species" for protection, and "150 priority threatened and at risk species" enhancement support each other/related. And how to achieve these two goals. Also, a capped number of 150 threatened species identified for management may not be the most suitable approach.

q13: Setting priorities should not be to the detriment of other threatened species that are not on the list.

q14: We acknowledge that this document is a very useful first step and leadership from DOC and we support in our regional biodiversity action plan. However it is unclear how the partnerships with regional councils (which is mentioned throughout the draft) may look like, and how we can contribute to achieving the strategy vision/goals. It is crucial this is documented in an action plan of this strategy.

q15:

File No: 22 12 05  
Document No: 10709759  
Enquiries to: [REDACTED]



31 July 2017

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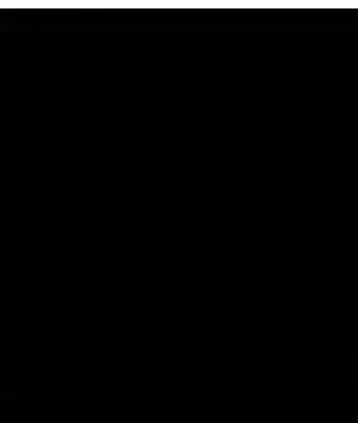
Threatened Species Strategy  
Department of Conservation  
P O Box 10420  
Wellington 6143  
New Zealand

Dear Sir/Madam

**Waikato Regional Council submission on the draft Threatened Species Strategy**

Thank you for the opportunity to make a submission on the draft Threatened Species Strategy. Please find attached Waikato Regional Council's submission regarding this document. The submission was formally endorsed by Council's Submissions Sub-committee under delegated authority on 18 July 2017.

Should you have any queries regarding [REDACTED]



## **1 INTRODUCTION**

- 1.1 Waikato Regional Council (the council) appreciates the opportunity to make a submission on the draft Threatened Species Strategy (the Strategy). The council has also contributed to the submission prepared on behalf of regional councils collectively (through the Regional Council Biodiversity Working Group).
- 1.2 Regional councils have statutory responsibilities which are critical to New Zealand's threatened species. Many of these responsibilities are set out in national and local legislation. The Resource Management Act 1991 (RMA) sets out the council's responsibility to maintain indigenous biodiversity [S30(1)(ga)] and to maintain and enhance ecosystems in water bodies and coastal water [S30(1)(iia)]. These responsibilities are reflected in the Waikato Regional Policy Statement (WRPS) which sets policies and methods to manage biodiversity. Our second generation WRPS has strengthened its emphasis on biodiversity protection and management by giving direction for new, innovative and collaborative programmes aimed at restoring indigenous biodiversity in the Waikato. The council has further biodiversity related functions under the Biosecurity Act 1993 (Biosecurity Act). These include responsibilities to undertake monitoring and surveillance of established pests and to prepare and implement regional pest management strategies. Furthermore, the council promotes co-ordination of pest management and biodiversity protection between regions.
- 1.3 The Council's Strategic Direction 2016-2019 outlines our vision, mission and key outcomes to contribute to a sustainable future for our region. A healthy environment is a key part of the strategic direction, a key component of which is for the Waikato to become predator free in line with the New Zealand 2050 target, without compromising indigenous biodiversity.
- 1.4 Aligned with these responsibilities and direction the council has significant capacity to contribute to species recovery goals. Operational capacities in relation to habitat protection, biosecurity/ pest control and environmental monitoring are particularly relevant. The development and application of decision support tools by this council, including identifying and prioritising ecosystems for conservation management, and undertaking ecological research are also pertinent. Supporting and coordinating landowners and community groups undertaking habitat protection, pest control and ecological restoration is part of our business. There is an emerging culture of cooperation with our Department of Conservation (DOC) colleagues in achieving biodiversity conservation goals at priority sites.
- 1.5 The council supports the overall intent of the Strategy which aims to halt the decline in our threatened species and restore them to healthy populations. General high level comments and specific suggestions on the Strategy are provided below.

## **2 GENERAL COMMENTS ON KEY ELEMENTS OF THE STRATEGY**

- 2.1 The Strategy is long overdue given the ongoing declines in native biodiversity. The recent report by the Parliamentary Commissioner for the Environment on the state of our birds confirms the urgent need for a more effective approach to reversing ongoing biodiversity declines. It is encouraging to see this strategic initiative and the council commends DOC for the effort to improve the status of threatened species. We appreciate the Strategy is aspirational, however, note it has no accompanying action plan and is silent on resourcing. We also note the link between strategic goals and tactical actions is unclear, making it difficult for the council to identify where and how we can best contribute to its implementation.
- 2.2 A partnership approach will be key to delivering on the outcomes of the Strategy. Understanding and recognising the roles and responsibilities of a range of other organisations is critical to achieving a meaningful partnership approach. The council would have preferred to have seen such an approach reflected in drafting in the Strategy to set the tone for the process to follow.

### 2.3 The Four Goals

The council supports the intent of goals 1 and 2 to manage more species, however we note that the species lists are not comprehensive. While criteria have been used to prioritise the species listed, the council would appreciate the opportunity to provide its perspective on augmenting the list to reflect regional priorities (for example, critical species found within the Waikato Region). Species have been selected with a bias toward public conservation land. This needs to be balanced to reflect the importance of private land as a stronghold for many remaining rare and threatened species within the Waikato Region.

2.4 We support goal 3 and its intention to integrate Te Ao Māori and Mātauranga Māori into species recovery programmes. We note that understanding how this can be achieved, the processes to be used and the relationships required to get this underway are critical to success. The council has strong networks and relationships with iwi Māori and we are assessing how to better-integrate mātauranga Māori into our existing work programmes. We are also developing relationships at marae and hapū level in an attempt to better understand needs and aspirations with respect to biodiversity and to build capacity to enhance biodiversity “co-management”. This knowledge, expertise and learning can be shared with DOC to assist to achieve high level goals.

2.5 Filling important knowledge gaps (as per goal 4) is a valid strategic goal. The council has roles, and capacity, in research and working collaboratively with other science providers, including through the national science challenges and other mechanisms. Again, these relationships can be leveraged to assist DOC to achieve its stated goals.

2.6 The council considers that an additional goal is required to capture the ecosystems focus (which is referred to at various points within the Strategy), that is, species need to be considered within the broader context of ecosystems.

### 2.7 The Five Strategic Themes

The strategic themes provide the greatest potential overlap, and alignment with, the council’s biodiversity management roles and responsibilities under the RMA, the Biosecurity Act and in relation to our strategic direction (working together in partnerships). This potential alignment is illustrated in the diagram in Appendix 1. It outlines the biodiversity management approach the council is taking to give effect to the WRPS and deliver on our strategic direction.

### 2.8 The Ten Key Actions

The final part of the Strategy lists ten key actions to deliver on the five themes and four goals. In the council’s view, the links between the five strategic themes and the ten key actions are not clear. The majority of actions seem to simply be headings, with some merely referencing delivery of other strategies (e.g. Biosecurity 2025), or programmes (e.g. freshwater reforms). Without providing a greater level of detail it is hard to see how the five themes and four goals will be achieved. This undermines the value and effectiveness of the Strategy.

The council submits

- Accompanying information on how the Strategy will be resourced should be provided.
- Consultation with regional councils when developing the threatened species list would be beneficial.
- The existing relationships regional councils have with iwi and hapū and science providers should be utilised to assist DOC achieve goals 3 and 4.
- The importance of private land as a stronghold for specific species should be incorporated into the Strategy.
- A fifth goal regarding the importance of ecosystems should be included.
- A greater level of detail to clearly show how the 10 actions and 5 themes will interconnect and work together to achieve the goals should be provided.



### 3 SPECIFIC SUGGESTIONS TO THE STRATEGY

- 3.1 The Strategy could build on existing relationships and programmes undertaken between DOC, regional councils and other agencies to further develop and strengthen them to improve alignment and to ensure complementary activities achieve collective and maximum impact.
- 3.2 DOC has key roles in conserving biodiversity on public conservation lands. With the identification of goals and priorities it can be hoped that this Strategy will lead to increased government funding so that DOC can make further progress towards these goals. The size and complexity of this task, however, means that it is unlikely to be effectively managed by one agency alone.
- 3.3 A summary in the Strategy of the factors limiting DOC's ability to manage more species would provide a useful justification not only for additional central government funding, but would also allow regional councils, territorial authorities, philanthropists and others to identify how they might contribute. Such a summary would also allow community groups, landowners, iwi and others to appropriately focus their efforts to complement DOC programmes.
- 3.4 The council will be looking at the criteria for species selection to ensure the full range of Waikato threatened species gets appropriate consideration. As a region, the Waikato has a greater proportion of threatened freshwater fish and reptiles than birds. Furthermore, New Zealand's freshwater fish and reptiles are more taxonomically distinct than those in the rest of the world, compared to our birds. We note there are only five threatened plants on the 150 threatened species list.
- 3.5 Although DOC notes that ecosystem management units may be on land or water of any tenure, it is likely that this approach has led to a weighting towards public conservation land. Species which occur mainly on private land, such as mudfish, small-scaled skink and Coromandel striped gecko, are less likely to be included.
- 3.6 The Strategy does not recognise or detail the ecosystems that need to be "managed at scale" to protect species and therefore council cannot see how it will work in our region. To achieve representation of ecosystems will require a focus away from public conservation land and rely heavily on the tools, resourcing and processes undertaken and facilitated by regional councils.
- 3.7 Regional councils have important responsibilities to assist with improving biodiversity on private land. Because some threatened species occur partly or entirely on private land it is clear that regional councils will have an important part to play in their recovery. A strategic framework that facilitates inter-agency alignment will do much to enhance the effectiveness and efficiency of biodiversity conservation projects on both public and private land. The council would be willing to work on joint planning for management where habitats are on both private land and public conservation land.
- 3.8 The number of community groups involved in conserving biodiversity at local sites is growing rapidly and is a feature of the New Zealand conservation scene today. These groups contribute significant collective capacity and underpin progress being made in many places. Supporting and co-ordinating these groups as they strive to achieve and sustain conservation outcomes, and as they tackle larger and more complex conservation projects, is a growing role for many regional councils and is becoming an integral part of the way the council works.
- 3.9 It is encouraging that a partnership approach is promoted in the Strategy through which it is anticipated that additional capacity from other organisations may be directed to augment DOC's efforts. There would be value in acknowledging and promoting the important roles that iwi, regional councils, community groups, landowners, QEII Trust, philanthropists and others could play as partners in implementing this Strategy.

3.10 Resourcing is a critical aspect of achieving the ambitious goals set out within the Strategy. Managing another 150 species, on top of current commitments, requires the development of an aligned funding model. Clearly without additional funding the goals will not be met. Options include moving the existing level of funding around (re-focussing or re-prioritising), seeking an improved quantum of funding, or seeking funding from a variety of different sources. There is a significant risk to regional councils that without a well thought out funding strategy, ratepayers will be expected to pick up the tab for achieving nationally important biodiversity tasks. The council would like to see an aligned funding model that spreads this risk to include appropriate national, regional and local contributions supported by a range of other sectors such as industry, the philanthropic sector, and other options.

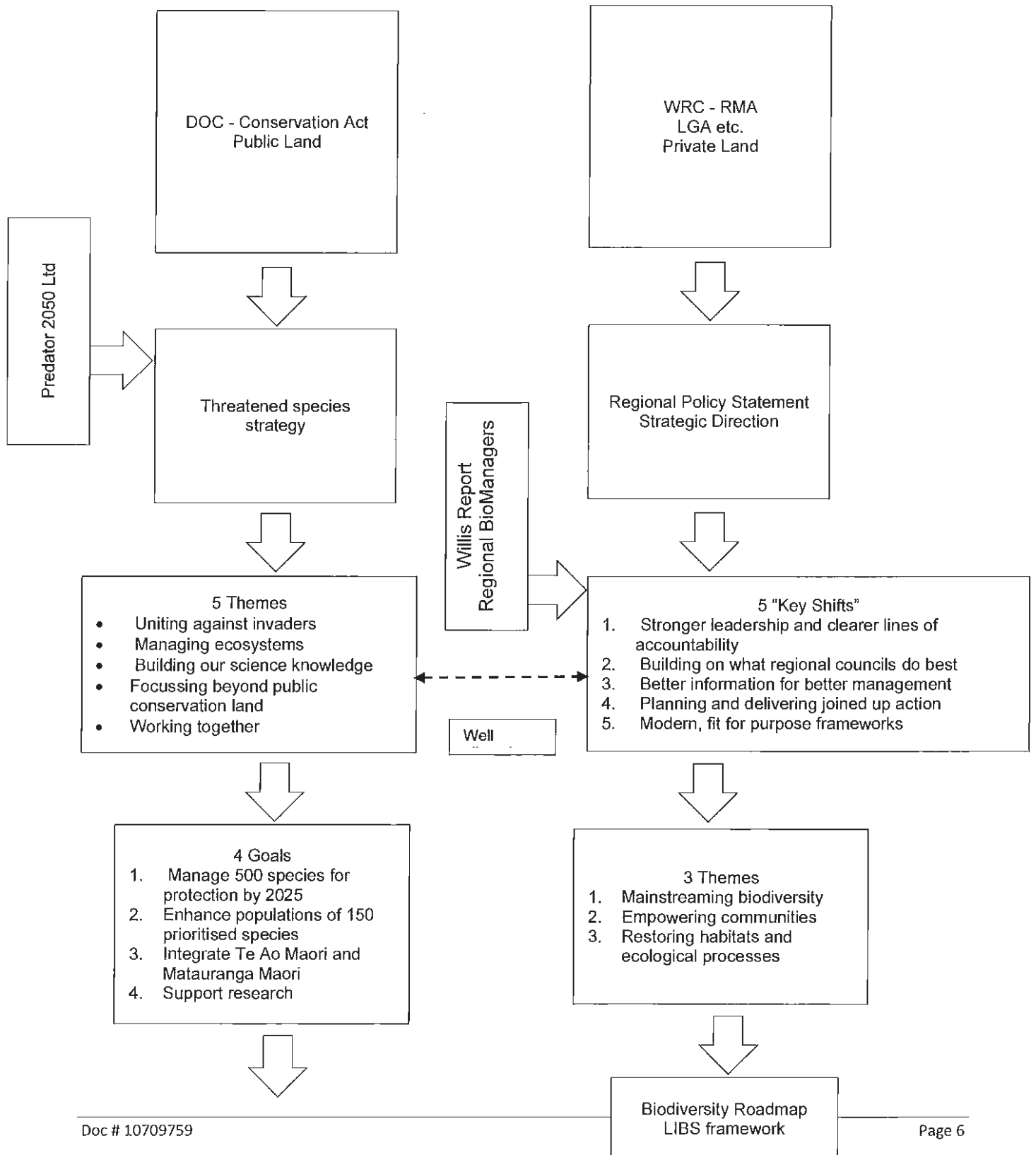
The council submits

- The Strategy should highlight the existing relationships and shared work programmes between multiple agencies to promote and advocate for further development.
- A summary of factors limiting DOC's ability to manage more species would be a useful inclusion in the Strategy.
- Regional council input into the criteria for species selection onto the threatened species list should be considered.
- The location of ecosystem management units should be further considered to ensure the right types of areas are captured.
- The Strategy should include reference to working with regional councils on joint planning where habitats are on both private and public conservation land.
- Discussion on how support could be given to community groups to achieve biodiversity outcomes should be included in the Strategy.
- The Strategy should further advocate and promote the important partnership roles that iwi, regional councils, community groups, landowners, philanthropists and others could play as partners in implementing this Strategy.
- The council would like to see an aligned funding model that spreads this risk to include appropriate national, regional and local contributions.

## 4 Conclusion

4.1 Thank you for the opportunity to provide comment on the Strategy. The council is happy to receive communications in relation to this matter. [REDACTED]  
[REDACTED]

**Appendix 1: Alignment and complementary activities**



Top 10 Actions  
See appendix 1

**From:** [redacted]  
**Sent:** Thursday, 20 July 2017 11:48 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [redacted]

Organisation:

Email: [redacted]

q1: It's a good start...

q2: Yes, the carbon sequestration potential of not only the million hectares of marginal land for farm highlighted by the Parliamentary Commissioner for the Environment, but also the habitat of all our endangered terrestrial species presently under siege by browsing possums.

Our commitments under the Paris Agreement are seriously compromised by the continued loss of canopy in our protected native ecosystems currently part of the ETS.

q3: I do, and it has taken too long for this Government to realise that the reduction in funding of DoC has seriously limited the critically important work required to bring these native species back from the brink of extinction. Until all native species are off the endangered list it is a matter of deep shame to all who care.

q4: It is a good start but actions speak louder than words. DoC need to be properly funded and staffed to lead the charge if we are to make a serious improvement in protect of native species.

We cannot assume other entities will fill in the gaps created by chronic underfunding and the loss of expertise which resulted. Other groups need to work with DoC and be guided in the right directions otherwise there is a danger that enthusiasm will be misplaced.

q5: Proper financing is critical for other aspects of the strategy, not just for the Top 10 actions. Fencing of privately-owned ecosystems, riparian plantings of natives acting as biodiversity corridors, pest and weed control, the million hectares noted by the PCE which could create prime habitat for native species as well as enhance soil and water values - all need action now. The war-footing analogy is appropriate.

q6: They will be the framework, but action is needed now. All the monitoring and assessments have been done, but the Government needs to lead this as Churchill did - from the front. The vision is winning the war to save our ecosystems and their native inhabitants. Environmental groups are the front-line troops who need arming, and leadership from those who know what needs doing. Those leaders are DoC, scientists, and experts in their fields.

q7: The time-frame needs to be shorter, the financing must come from the \$1.4 Billion set aside for carbon credits per year that need to be invested in New Zealand rather than Columbia.

q8: Everything, including the themes, need to be focused around 'If the land is well, and the sea is well, the people will thrive'. The land can only be well if the ecosystems are healthy, and our waters are healthy. The sea will be healthy if the rivers are clean, have flows that are vital for ecosystem health, as well as hydraulic functioning...so vital for coastal processes and fisheries as well as countering ocean acidity.

q9: They are a good start but as ecosystems require all constituent parts to be active and healthy it would be wise to act holistically rather than just pick 'winners'. Pest and weed control that allows whole ecosystems to flourish gives endangered species a better chance of survival.

There needs to be complete eradication of predators from all conservation land, whatever it's status.

q10: MPI must be financed and required to immediately deal with bio-security incursions such as Myrtle Rust and Kauri die-back as these will affect the success or other-wise of this threatened Species strategy, habitat being the key to future survival. No more Ruataniwha-type land swaps please as we have so little lowland habitat left that every bit is precious.

q11: too few

q11 comments: They should all be a priority as they are all part of an intricate web of life, no matter how humble.

Obviously, Maui's dolphins need to be immediately protected by changing fishing methods and creating meaningful marine parks, so there will be a triage required for these and other species such as black stilts to ensure they do not go extinct, but the battles to save our species must be on all fronts simultaneously to ensure victory sooner rather than later. We need to see measurable progress each year starting now.

q12: Given the shameful lack of knowledge about many of our native species it is not possible to answer this as a layperson. If we create the right conditions in which all our species may thrive then those which are not listed will survive and be there for us to eventually study.

q13: See (12).

q14: Actions speak louder than words. If the Government immediately funds DoC to launch this Strategy in addition to increased funding for its other conservation work, makes funding available to Regional Councils for weed and pest eradication, and fencing assistance for private landowners to protect native ecosystems and for riparian planting of suitable native species, as well as legislation to protect upper catchments from clearance of native vegetation then it will be obvious that this strategy is off to an excellent start.

q15: Government leadership through DoC, assisted by scientists, NGOs and others who share a determination to ensure the survival and flourishing of all our endemic species will be predicated on proper Government funding, with everything else being a bonus. In doing so, we will begin to make real progress towards a low-carbon future, a sustainable economy, productive and healthy communities, and a country that we can be proud of, again. The World is watching.

**From:** [REDACTED]  
**Sent:** Friday, 21 July 2017 12:28 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
Organisation:  
Email: [REDACTED]

q1:  
q2: I see Doc as an advocate for the management of threatened species protection but it shouldn't be the only institution who conducts the management. All the ongoing and future projects should be mentioned, reported, coordinated and advertised.  
The 150 species are only those Doc works on and it gives a wrong picture (for invertebrates it would be mainly beetles, moths and snails Since this is a NZ wide strategy that will be signed off by the cabinet all government related institutions and departments should include their managed species. The full threatened species list should be included to see the gaps which leads us to the goal. What about species that benefit from another species management (e.g. short-tailed bat and bat fly).

q3: yes  
q4:  
q5:  
q6:  
q7:  
q8: I miss climate change!!!  
q9:  
q10:  
q11: toofew  
q11comments:  
q12: No, I don't think so.  
q13: see above.  
q14:  
q15:

**From:** [Redacted]  
**Sent:** Friday, 21 July 2017 4:26 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [Redacted]

Organisation:

Email: [Redacted]

q1: I enjoyed reading the Strategy. It would be hard to disagree with the words of the Minister and the DG. The section on Trouble in Paradise speaks to both the Science and the Spirituality of the interconnected nature of our world. I agree with the general vision to halt the decline of our threatened species and restore them to healthy populations. I support the call of the NZ Parliamentary Commissioner for the Environment "The restoration of abundant, resilient and diverse species and habitats across their natural range." However "managing" 500 species by 2025 will not restore them, and could see them decline further. Targetting only 150 out of 800 threatened species "to enhance them" is sadly inadequate. My vision is to see all threatened species being managed to enhance/restore healthy populations. The only thing limiting DOC's ability to do this is presumably lack of funding. Sadly over the last few years we have seen DOC struggling with inadequate funding, There is a mismatch between the vision and the proposed action. I know DOC doesn't decide its own funding but the strategy needs to set out the vision and what it would cost so that government recognises the true cost of restoring New Zealand's threatened species to healthy populations.

q2: I strongly support the aim of New Zealand being predator free by 2050 also The Battle for the Birds and the War on Weeds. However there is also the need to protect habitats. Freshwater habitats are under threat from intensive agriculture, with many species of whitebait and Long-finned eels at risk. DOC cannot undertake this work on its own, MPI has to recognise its role particulatrly in fresh water. There are also threatened marine species, like Hectors and Maui dolphins, their protection also requires support from MPI and the fishing industry. The focus of the strategy seems to be on land ecosystems, we need strategies for restoring wetlands, setting up marine reserves, cleaning up freshwater, much stricter harvesting of whitebait and some marine fish and better protecting Hector and Maui Dolphins. More support for community organisations such as Ecosanctuaries (Orokonui in Otago has lost DOC funding), and for return of reclaiming land from agriculture to return to native bush. I would like to see stronger legislation The development of native threatened plant and habitat protection legislation is supported..

Support the adoption of a comprehensive National Policy Statement on Indigenous Biodiversity under the RMA.

Support greater use of legislation, regulation and policies to ensure that human actions do not further threaten species, for example zero bycatch of threatened species in the fishing industry, no clearance of threatened species habitats.

Development of a National Policy Statement on indigenous biodiversity is supported provided it sets bottom lines for biodiversity protection on private land, that will achieve the vision and the goals needed to protect and enhance all our Threatened and At Risk native species and prevent others becoming threatened.

q3: Yes, New Zealand has a unique biodiversity which most people see as a taonga. It is of great significance to Maori and is an integral part of Maori culture. It is also valued internationally and is valued by visitors to our shores.

q4: I accept that 1080 is a necessary tool for eradicating mammalian pests, although I hope we can discover a less toxic solution, better traps and perhaps control of fertility. Prioritisation tools require skilled staff for observation,



and management of flora and fauna. Perhaps too much of staff time is taken with managing the infrastructure, huts, tracks, toilets etc. As the tourist numbers grow management of the Conservation estate will require more money and more staff and it is important this is not at the expense of the conservation work of the staff. There may be a need to exclude visitors from some part of the Conservation estate, eg protecting the Kauri.

q5: Legislation

Better funding

Allow DOC to advocate for conservation, even against other ministries, especially in the Environment Court. Make sure DOC is not put in a compromising position eg, forest park swap in the Lake Ruataniwha Dam proposal.

q6:

q7:

q8:

q9: Yes

q10:

q11: too few

q11 comments:

q12: I agree with the species prioritised although I would like to see more species added.

q13:

q14: I think the strategy is a good beginning but does not go nearly far enough. I cannot help but think the vision and goals are limited by the amount of money expected in DOC's budget. This is sad since we have already lost too many species and cannot afford to lose any more.

q15: I congratulate the presentation team on a beautiful and well written document. However I believe that the increasing complexity of the human endeavour is at the expense of the decreasing complexity of the natural world. As long as we see the natural world as an "add on" on which we spend as little money as we can get away with, species and habitats will continue to be lost.,

**From:** [REDACTED]  
**Sent:** Saturday, 22 July 2017 10:09 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]

Organisation:

Email: [REDACTED]

q1: The vision is too limiting it is not expansive enough to enable people to become part of a vision to secure our 3000 threatened species

q2: To achieve this vision or any other of this nature requires the involvement of every New Zealander. The vision of partnership is too narrow. The vision should include the mobilization of all new Zealanders to action

q3: Yes we are in crisis. Lets face the facts and get New Zealanders motivated and involved through incentives from tax breaks to awards and grants for results

q4: Where are "people" tools. Only mobilization of every New Zealander from the youngest to the oldest will achieve sustainable results. People are the key tool/resource

q5: Mobilize New Zealanders and a conservation conscience "citizenship". It needs to be conservation by the people for the people. Government or big business and not even conservation groups can do this without an aware and mobilized citizenship. The tools have no strategy to mobilize New Zealanders. The reason for this I believe is because DOC has the legal mandate this has disenfranchised the public and caused the government institutions to become distanced from people and as a result everyday New Zealanders feel marginalized from conservation and unable to relate and know how to become involved. It is perceived as the government's or someone else's problem to solve

q6: Yes and no. It will help but it is not extensive or inclusive enough

q7: Work with all education institutions, communities, district councils, conservation groups, local businesses, tourism industry and every other government sector where conservation goals need to be part of every entity and person. There needs to be a divestment of responsibility and authority

q8: Yes but it is too top down

q9: Yes but it is not serious enough on intent to reverse the decline. We need actionable steps every New Zealander can take now. All our research will show is that we did too little too late

q10: Mobilize New Zealanders

q11: too few

q11 comments: You have identified these but what have New Zealanders identified?

q12: Again if this is a "war" the "enemy" is in many forms. They need to be confronted where they exist. Let new Zealanders decide where they will engage and enable them to do so if they desire. The prioritization through this strategy are consigning some species to extinction. This should not be your decision

q13: All endemic species have the right to exist. All threatened species should be able to be helped. Limited vision, budget and political will power is the root cause for this limited strategy. Why not have tourism for example pay for this more. Why not mobilize tourists to help with eradication so that New Zealanders see its important and visitors alike. We are still too "silo" orientated and not inclusive or empowering of the average "kiwi"

q14: Unfortunately No

q15: Make it big, bold and something everyone owns and feels responsibility for as a New Zealander. This present strategy doesn't do that. A call to "arms" requires every man women and child involved and they should all feel the responsibility to act for a predator free NZ and where our endemic species are free thriving "kiwi's" too

# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

[REDACTED]

Organisation name:  
(if on behalf of an organisation)

[personal submission]

Email:

[REDACTED]

Signature:

(we accept a typed signature if  
no electronic signature)

[REDACTED]

## Submission:

### Background

1. I am a scientist specialising in the naming and classification (taxonomy) of plants. I have a working knowledge of the New Zealand Threat Classification System (NZTCS), having contributed to the listing for vascular plants.
2. New Zealand society is evidently failing in its kaitiakitanga (guardianship) obligations for its indigenous species, with c. 800 species facing extinction (i.e., those formally classified as Threatened, which means they have small and/or declining populations). The majority of these species are Threatened because of changes caused directly or indirectly by humans.
3. The indictment becomes even direr given that (A) nearly one-quarter of the c. 13000 species assessed cannot be given a conservation status (i.e., they are Data Deficient) because we know so little about them, and (B) of New Zealand's estimated 50000 indigenous species<sup>1</sup>, only about one-quarter have been assessed. The true number of indigenous New Zealand species meeting the criteria for Threatened status is certainly much higher than 800, perhaps by an order of magnitude.
4. New Zealand clearly needs to do more to sustain its indigenous species – *New Zealand's Threatened Species Strategy* is a welcome attempt to address this.

### The centrepiece is Goal 2 – it is wonderfully ambitious (if it is what I think it is)

5. The focus of my submission is on the Strategy's goals, particularly Goal 2. In dealing with numbers of species, Goals 1 and 2 provide accountable measures by which to judge the long-term success of the Strategy and move it beyond pure rhetoric.
6. For me, Goal 2 is the centrepiece of the Strategy. It is incredibly bold and I strongly endorse it, but these comments are prefaced on my having correctly understood the Strategy's wording (see below).
7. Given the definition of "enhanced", I interpret Goal 2 to mean that 150 species will be managed such that they move from Threatened categories (or At Risk – Declining) to the categories of At Risk – Recovering or Not Threatened. I make this interpretation because species in any of the Threatened categories (or in the At Risk – Declining category) manifestly do not have "long-term sustainability". To successfully "enhance" a species that was Threatened must mean its numbers increase (or stop declining) such that it no longer fits the criteria for Threatened.
8. The current woolly prose for Goal 2 in the Strategy would benefit from clarification, with additional technical detail (i.e., which threat categories are we dealing with?). This point is strengthened if my above interpretation of Goal 2 is incorrect/incomplete (given that I

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<sup>1</sup> Gordon (2009, 2010, 2012) New Zealand Inventory of Biodiversity. Volumes One, Two, & Three. Canterbury University Press.

am not absolutely clear what Goal 2 means, and this even though I have working familiarity with the NZTCS).

9. Goal 2 of the Strategy is bold because New Zealand has had so little success in managing species so that their numbers improve and they move upward out of the Threatened categories. The 2016 conservation assessment of New Zealand's birds<sup>2</sup> is hopefully a pointer of what can be achieved with determined efforts: of 77 taxa listed as Threatened in 2012, 14 progressed to an At Risk category (although only seven of these were attributed explicitly to conservation management), and this improvement was partially offset by three other taxa moving from At Risk to Threatened.
10. Context for the audacity of Goal 2 also comes from critique of the other current conservation assessments (see Appendix 1). Among these assessments, which cover some 450 Threatened taxa, there is little evidence that decline is being reversed by conservation efforts. Since the previous assessments for these groups, only 24 taxa had progressed from a Threatened category to an At Risk or Not Threatened category. Worryingly for conservation practitioners, none of these was explicitly attributed to successful conservation management (seemingly instead being due to new or reinterpreted data). At the same time, 73 taxa actually deteriorated from an At Risk or Not Threatened category to a Threatened category. These data clearly demonstrate that New Zealand's current conservation efforts are resulting in a trajectory for Threatened species in the opposite direction to that sought by the Strategy.
11. The 2025 deadline for Goal 2 is unrealistic (in light of what New Zealand has previously accomplished – see Points 9 and 10). It is nevertheless important that a definite achievement date is set for accountability. Perhaps something like “Enhance the populations of 150 prioritised threatened and at risk species by 2030, with enhancement plans for all of these species in operation by 2020”.

### **The other goals**

12. Goal 1 needs to be explicit about what categories of species (i.e., Threatened, At Risk, or a subset of these) will be added to those in “long-term protection”. The first paragraph on page 28 implies that it will be just Threatened species, but this needs clarification. As currently worded and detailed, there is insufficient background or publically available data, for this to be an accountable goal.
13. Goals 3 and 4 are laudable rhetoric.
14. If Goal 4 is all about Data Deficient species (as defined in the NZTCS), it is wrong to believe that much help will come from the National Science Challenges. They do not have the expertise to deal with the taxonomic and distribution issues of Data Deficient taxa; instead, that institutionally rests primarily with New Zealand's collections-holding agencies<sup>3</sup>. What the National Science Challenges may be able to address are the demographic and ecological problems facing taxa requiring conservation management, be they Data Deficient or otherwise.

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<sup>2</sup> Robertson et al. (2017) Conservation status of New Zealand birds, 2016. Department of Conservation.

<sup>3</sup> Royal Society of New Zealand (2015) National Taxonomic Collections in New Zealand.

## Which species?

15. From the subset of New Zealand's biodiversity that have been conservation assessed, there seems a reasonable spread of diversity on the list of "150 priority threatened and at risk species" for Goal 2.
16. It is nevertheless damning that, besides mammals and birds, only two marine species appear on the "150 priority" list. This presumably is because the majority of New Zealand's marine species have not had their conservation status assessed (e.g., most marine invertebrates, marine fishes, seaweeds); the same is true for several major terrestrial groups, including fungi and most terrestrial invertebrates. Remedying this should be a "top action", with the Department of Conservation working with other agencies to achieve this. These newly-assessed species should then begin to make their way on to future editions of the "priority" list, according to "scientific criteria". If the Strategy purports to be about *New Zealand's* Threatened Species, it must embrace all of New Zealand's biodiversity and not just those subsets traditionally associated with the Department of Conservation.
17. Good luck.

**Appendix 1.** Current conservation status assessments other than birds, compiled using data extracted from reports available at <http://www.doc.govt.nz/nztcs> on 23 July 2017.

Group	Number of Threatened taxa in latest listing	Taxa moving from Threatened to At Risk or Not Threatened (i.e., 'enhanced')	Taxa moving to Threatened from At Risk or Not Threatened (i.e., deteriorating)
Hymenoptera	2	0	0
Reptiles	37	0	0
Orthoptera	8	0	2
Stick insects	1	0	0
Marine mammals	8	0	0
Mosses	20	0	1
Fleas	1	first listing	first listing
Liverworts	16	2	1
Earthworms	0	not applicable	not applicable
Marine invertebrates	11	15	1
Freshwater invertebrates	36	2	29
Freshwater fishes	21	0	6
Bats	4	0	0
Frogs	4	0	1
Vascular plants	289	5	32
<b>Total</b>	<b>458</b>	<b>24</b>	<b>73</b>

24 July 2017



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[www.ecan.govt.nz](http://www.ecan.govt.nz)

Threatened Species  
Department of Conservation  
PO Box 10420  
Wellington 6143

**Email: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)**

Dear Sir or Madam,

**Environment Canterbury submission: Threatened Species Strategy**

Thank you for the opportunity to provide comment on the Threatened Species Strategy. Environment Canterbury's submission on the Threatened Species Strategy is attached.

For all enquiries please contact:

[Redacted]  
[Redacted]  
Phone: [Redacted]  
Email: [Redacted]

Yours sincerely

[Redacted signature]

[Redacted signature]

**Encl:** *Environment Canterbury Submission to the Department of Conservation on the Threatened Species Strategy*

# **Environment Canterbury submission on DOC Threatened Species Strategy**

21 July 2017

## **Introduction**

1. The following contribution is offered on the basis of Environment Canterbury's roles and responsibilities under the Resource Management Act 1991 (RMA), the Local Government Act 2002 (LGA), and the Biosecurity Act 1993. Regional council's role includes the establishment, implementation, and review of objectives, policies and methods for maintaining indigenous biological diversity and maintenance of indigenous biological diversity.
2. The Canterbury region covers a diverse range of ecosystems and landscapes which are home to a number of unique and rare fauna. The Canterbury mudfish/kōwaro is endemic to the region. Acutely threatened birds such as wrybill/ngutu-pare, black-fronted tern/tara and black stilt/kakī have important habitat areas within the region. At least seven threatened lizard species are found within the region. The region's indigenous species include a number of fish, birds, plants and marine mammals specifically recognised by the Crown in the Ngāi Tahu Claims Settlement Act 1998 as taonga species.
3. Effective strategies and initiatives are key in the context of biodiversity decline, multiple changing threats to biodiversity and the complex nature of biodiversity roles and responsibilities. Environment Canterbury is supportive of the intention of the strategy, however feels it lacks clear strategic direction and would benefit from tangible targets and goals underpinned by clear actions, accountability and funding to support the work.

## **Vision**

4. The vision sets out what the strategy is and other existing initiatives rather than envisaging the desirable future state for threatened species. The vision should be more future focused, concise and engaging on what the vision is for threatened species. An option could be similar to the wording used in the foreword, the ambition to 'halt decline and restore healthy, sustainable populations of native species'.
5. The purpose, vision and focus all refer to working together in partnerships, including between government agencies and Māori. Whilst the strategy focuses on threatened species, there is intrinsic linkage with regional council work on habitats, predator control and engagement with landowners, iwi and community/catchment groups. Therefore we support the emphasis in the strategy on collaboration. However, consultation with the regional councils during the drafting of this threatened species



strategy sector was inadequate. There is an ongoing need for greater involvement of regional councils at strategic decision making and policy level, particularly where issues impact the regional sector. Additionally, the protection of taonga species is integral to Māori and consultation with Māori in the development of strategies and policies should be carried out.

## Tools

6. The prioritisation of species recovery using DOC's natural heritage prioritisation tools takes into account the conservation status and uniqueness of species, the ecological condition and potential for improvement of ecosystem management sites, and the cost of management. The strategy also promotes the use of spatial planning tools to identify and prioritise Ecological Management Units (EMUs). Currently there is no consistent approach to prioritising sites between DOC and other biodiversity players across land tenures and regions. Halting the decline of biodiversity would benefit from a move to a more consistent, systematic, and universally applied prioritisation approach to identify ecosystems and habitats to manage threats on.
7. The critical role of biosecurity and research into biocontrols has been identified in the strategy. The recent Parliamentary Commissioner for the Environment report 'Taonga of an Island nation' stated that research into predator control should be strongly supported as well as use of genetic techniques to control predators. The control of plant and animal pests is a core mechanism of biodiversity management. In the regional council sector submission to MPI with regards to Biosecurity 2025 direction, it was noted that tackling this challenge will rely on a whole of system approach and clear strategic direction is needed to ensure that limited resources are employed into the greatest areas of need. In this submission, we emphasis again the need for a whole of system approach and clear strategic direction for a more effective joined up approach on predator control.
8. A tool on regulation has noted limited powers in legislation to protect biodiversity on private land without the owner's agreement and the development of the proposed biodiversity NPS as well as marine protection. Any change in regulatory tools will have significant implications for the regional sector, particularly given management of land use and engagement with landowners. There is a need to consult with the regional council sector in developing legislation to help make it fit for purpose.
9. The regulation section on page 25 lists legislation that can provide protection (the Wildlife Act 1953 and the Freshwater Fisheries Regulations 1983) and notes that there is no direct legal protection for plants. A review and overhaul of existing legislation as part of the regulatory reform is needed and whether there is adequate protection for threatened species, including the use of regulatory powers should be strongly considered.

## Strategy and goals

10. Strategic themes are largely based on existing initiatives where work is already being done such as Predator Free 2050. The themes also note in working together in partnerships that the government will continue to provide leadership for the conservation of our natural environment. There is a continuing need for more formal partnerships and strategic governance including with the regional council sector. Regional councils support the need for formal partnership arrangements, with effective leadership and governance that would provide collaboration in the identification, prioritisation and delivery of biodiversity projects. It would also ensure roles and accountabilities are clear and strategic and operational issues are identified and managed.
11. The strategy links up with mātauranga Māori and research programmes such as national science challenges and conservation and science roadmap to collectively build our science and knowledge base. Within the threatened species strategy there is little consideration of future pressures or opportunities, and therefore capabilities needed going forward. For example, increasing incursion and response pressures are likely to face the system in the future. In setting out strategic frameworks there is a need to consider what future pressures and capabilities may be required.
12. The state of our species graphic on page 12 is inaccurate and misleading as the percentage proportion of species does not match with the bars. For example, the 4 of 5 bats threatened/data deficient look more like 40% not 80% of the bar graph displayed. It is also unclear whether threatened species includes at risk species.

## Actions

13. It is unclear what actions are going to arise out of this particular strategy as a number of the actions are based on existing initiatives underway such as Predator Free 2050, Biosecurity Direction Statement 2025 and regulatory reforms.
14. Given that the actions span across a number of initiatives and biodiversity stakeholders, clearer actions are needed with measurable objectives and key performance indicators to be more specific about what this strategy aims to achieve. Clearer actions with early consultation on what is intended by the actions is crucial to ensure that regional councils have clarity as to what will be required. This should also include accountability for delivery and expectations. For example, it is unclear what the action to identify and publish threatened species 'hotspots' on and off public conservation land will require regional councils to do.
15. Page 3 of the Threatened Species Strategy states that the clear species goal will also guide decisions by local councils in their biodiversity work. With the inclusion of this list of species now within a strategy, it is important to understand whether priorities will change for species not listed and whether existing or future planned projects will be

impacted with the reallocation of resources. Ongoing collaborative work is needed with regional councils and other partners to ensure that limited resources are employed into the greatest areas of need.

16. There are also concerns about the constraints of existing budgets and lack of additional funding behind this strategy. Work should be undertaken, if it hasn't already, to determine current capacity and capability of DOC and partners to deliver these actions and future capability needs. With this a further understanding of what work programmes will be initiated or if work will be reprioritised as a result of this strategy, outside of existing initiatives. Given links between habitats and threatened species work, it is imperative that regional council sector understand whether resources will be reallocated and the impact on existing or planned DOC funded or part-funded partnership projects or implications for ratepayers.

## **Species**

17. 150 species currently being managed for protection have been selected to be enhanced. The strategy recognised that some ecosystems contain numerous threatened species and it will be important, given the overlaps with work in protecting habitats, that prioritisation of species/ecosystems is done in collaboration with regional council sector for effectiveness. There is a need for a more consistent approach to prioritisation amongst regional councils, between regions and other players.
18. The strategy notes that DOC will monitor those not actively being managed and react if there is a threat of extinction. A flexible approach is imperative if there is a change in situation such as an emerging pest threat. It is unclear that if another threatened species emerges, will other species drop off the list or will the list be added to? No indication was given on the timeframe that the list would be reviewed and updated, and whether this would be regular or on a case by case basis. It is important to understand whether work in ecosystems will be reprioritised if other species become more critical. A more collaborative biodiversity framework would allow for DOC and regional councils to share information on biodiversity, including state, threats and pressures and effectiveness of interventions.

## **Concluding remarks**

19. The strategy is a good overarching summary of current initiatives relating to the halt of the decline of threatened species and enhancing of populations. However, it is unclear what will change as a result of this strategy in absence of clear direction and direction on what it is regional councils will be expected to do as a result of this strategy.
20. Consultation and greater ongoing involvement of regional councils and other partners at a strategic decision making and policy level is needed, given council's role in the management of land use and its effects on ecosystems and indigenous biodiversity as

well as freshwater biodiversity. Implementation of more formal statutory partnership arrangements between DOC and the regional council sector would foster this needed consultation.

21. A more formalised collaborative biodiversity framework would also allow for DOC and regional councils to align in the identification, prioritisation and delivery of biodiversity projects and share information on biodiversity, including state, threats and pressures and effectiveness of interventions.
22. We wish to continue to develop and work in consultation with DOC to address challenges and make positive improvements to protecting, maintaining and restoring threatened species.

### **For further enquiries**

Please contact: Cecilia Ellis, Senior Strategy Advisor



# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter or contact person:	[Redacted]
Organisation name: <i>(if on behalf of an organisation)</i>	Wellington Zoo
Email:	[Redacted]
Signature: <i>(we accept a typed signature if no electronic signature)</i>	[Redacted]

**Submission:**

**You can answer all or some of the questions.**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

*On the whole yes it does. There appears to be a diverse focus and we applaud the inclusion of a species list.*

2: Are there additional aspects that you think should be included in the vision?

*We think that the survival of species requires international links as well and that NZ could utilise these for better outcomes.*

3: Do you agree with the characterisation of the value and current state of our native species?

*Yes. The effort required is immense and all partners must be included.*

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

*We would like to see the section here titled “captive management” on page 20 changed to ‘A Partnership with the Zoos, Wildlife Parks and Aquariums to better reflect the MOU which is in place- similar to Botanic Gardens which is headed similarly on page 21*

5: Are there other tools we could use to help us achieve the vision?

*Yes the One Plan approach from the IUCN Conservation Planning Specialist Group should be considered. This approach is used globally by the Species Survival Commissions of the IUCN. CPSG has an office located at Auckland Zoo.*

6: Will the proposed goals help us achieve the vision and assess our progress?

*They will assist but DOC needs to utilise all partners and stakeholders according to their specialist skill sets. For Example ZAA members are specialists in husbandry, conservation breeding, species management etc. and this should be reflected in the strategy. It seems that breeding for restoration is still not seen as a major contributor to species survival and we would like this to be highlighted more.*

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

No

8: Have we identified the right strategic themes?

Yes

9: Do you agree with our top 10 actions?

Yes

10: Are there any other actions that should be included, and any actions that should be removed?

*Advocacy for species protection- the whole community needs to understand the way they can help – it's not going to be all down to the scientists and govt officials to save our species. New Zealanders need to be part of the conversation – zoos, wildlife parks and aquariums can help with this given that we see over 2million visitors each year in NZ and over 250,000 at Wellington Zoo alone*

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • *About right* • Too few

**Comments:**

12: Have we identified the right priority species?

*At this time yes*

13: Do you think other species should be prioritised ahead of the ones listed? And why?

*no*

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

*Yes as long as the implementation phase is well organised and all players consulted. Working together in partnership pg 39 needs to go beyond community to those organisations which can add value to the science/ knowledge needed and undertake some actions required. This is especially true in the top 10 actions area.*

15: Do you have any further comments regarding the draft Strategy that is not covered above?

*One area which it totally ignored is the role of veterinary science and veterinary research in understanding the issues occurring in the environment. This is a major*

*contributor to species survival, science and knowledge base pg 35 and can assist with DOC research and understanding of strategic priority interventions. For example sea bird cases, lead toxicity cases, parrot veterinary cases.*

***On page 21 spotlight we would like to see the Inclusion of the veterinary work Wellington Zoo does for local fauna. We do all the veterinary work free of charge for Zealandia, DOC and the community within the Wellington region but often further afield eg Fiordland Crested Penguins. We contribute and lead research work for local fauna including lead toxicity in kaka and tui and malaria in Little Blue penguins. We are the most visited wildlife attraction in Wellington so our advocacy role is important. Our role should be mentioned along with all the other partners in Wellington.***

***On page 25 spotlight 'keeping sea birds safe' the work of The Nest Te Kōhanga veterinary team with sea birds should be highlighted. We care for sea birds from around the country after they have been injured and our data can be added to the national knowledge bank- note the research on malaria in LBP here:***

***Article: Cases of mortality in little penguins (*Eudyptula minor*) in New Zealand associated with avian malaria***

***Journal: New Zealand Veterinary Journal (TNZV)***



**From:** [REDACTED]  
**Sent:** Monday, 24 July 2017 3:33 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]

Organisation:

Email: [REDACTED]

q1: No. We have an obligation (environmental, ecological, cultural, social, economic) to protect what endemic and native species we have left. 20% would be laughable if it didn't hurt so much. We need to protect ALL species that are threatened or at-risk.

q2: Action put in place to prevent current ecological habitats of importance being destroyed for economic gain. Nature is New Zealand's economic gain.

q3:

q4:

q5: Money. More funding must be directed toward DOC to ensure these dedicated workers have the resources to do the job.

q6: No. You must include ALL threatened and at-risk species. Without that, the goals are far too modest to be of gain to biodiversity.

q7: As per Forest and Birds submission :

Amend the goals to include:

Enhance the populations of more than 50% of our threatened species so that they are on the road to recovery by 2025,

Manage all threatened species requiring conservation intervention for protection so that no species should become more threatened

All threatened and conservation dependent species should be actively managed for recovery by 2030.

Reduce by half the number of threatened species to ensure recovery to non threatened status

Select 230 data deficient species every year so that by 2030 there are no data deficient species

q8:

q9:

q10:

q11: toofew

q11comments:

q12: No. All threatened and at-risk species would need to be prioritised, and indeed require prioritisation.

q13:

q14:

q15:

# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter or contact person:	[REDACTED]
Organisation name: <i>(if on behalf of an organisation)</i>	Chatham Island Taiko Trust
Email:	[REDACTED]
Signature: <i>(we accept a typed signature if no electronic signature)</i>	[REDACTED]



## Submission:

### You can answer all or some of the questions.

1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

Yes. Although we feel that the partnership with Community Groups and Land Owners is too far down on the list. This strategy is going to require significant partnership with community and private land owners, and as such this should be given high priority and clearer definition in the vision statement. In many cases, the goals of this strategy are not possible without community buy in, and this needs better clarification in the vision.

Threatened species conservation is also a community vision.
2. Are there additional aspects that you think should be included in the vision?

No. But please see comments above in regards to greater emphasis on partnering with community and private land owners. Although we acknowledge that this is mentioned in the strategy, it is somewhat buried in the text.
3. Do you agree with the characterisation of the value and current state of our native species?

Yes. We feel the document has given a good indication of the value, and the present state of native species across New Zealand. However the strategy does not do enough justice to “Island endemics”. As such the Chatham Islands huge endemic flora and fauna is not fully highlighted, both in regards to the unique challenges that these face, but also the advantages. The Chatham Islands offer the opportunity for massive conservation gains with a large number of threatened species confined to such a small geographical area.

The strategy needs to put more emphasis on the state, and potential benefits of “Island endemics”.
4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

Yes. The strategy has outline the current tools in the conservation tool box. However we feel that community groups and land owners are also a powerful tool, and although mentioned latter in the document we feel that this could be added (see below).
5. Are there other tools we could use to help us achieve the vision?

As mentioned above, we feel that community groups and land owners are a powerful tool, in particular the empowering of these people to act as the foot soldiers on the ground. As such the tool may be advocacy, and often this is best generated from within the community. Most community groups are driven by a few key individuals from within the local community who then empower others. The ability of these people to inspire and encourage others is a powerful tool, which is often under-estimated.

6. Will the proposed goals help us achieve the vision and assess our progress?  
Yes. Although again we feel the strategy again drops the ball on the community. Although it acknowledges that community has a part to play, it is buried in the text.

7. Are there alternative goals that you think will better achieve the vision and assess our progress?  
Yes. This strategy does not take into consideration major offshore islands in New Zealand (Chathams, Stewart, D'Urville and Great Barrier Island). These islands have the potential for significant conservation gains and threatened species management. In particular they provide the opportunity as testing grounds for methods to rollout on Mainland New Zealand Predator Free 2050 programmes. We feel the strategy is missing a huge opportunity, these offshore islands could be removed of predators, both helping threatened species whilst developing the tools for mainland applications.  
A clear goal should be to remove predators from the Chatham Islands. Not just offshore island nature reserves.

8. Have we identified the right strategic themes?  
Yes. However we feel that listing private land owners and community groups at the end of this list, rather than at the beginning, hugely under values the work these groups do. We also feel it undervalues the huge importance these two groups are going to be playing in driving this strategy forward. DOC always mentions the important work of community groups, but this strategy always puts this last. Where it should always be first. The strategy clearly mentions the larger well-funded organisations (i.e. Predator free NZ, ZIP and the NEXT foundation), small community based groups which are punching well above their weight are not. We feel the Strategy is not going far enough to help and support grass roots conservation.

9. Do you agree with our top 10 actions?  
Yes.

10. Are there any other actions that should be included, and any actions that should be removed?  
The 10 actions again have missed the value that the large offshore island play in threatened species conservation. Although the goal of working towards predator free 2050 is great, and we totally agree, it has overlooked the opportunity that Islands such as the Chathams present. By removing predators from the Chathams a huge number of threatened species conservation status would be improved. So this should be a clear goal. Other islands such as Stewart, D'Urville and Great Barrier Island) also present such opportunities. This strategy just focuses on the offshore nature reserves, and feels as if it is DOC just focusing on its own land, and not listening to the communities and landowners

on these large offshore islands. This is a huge gap in the strategy, and the real loss of an opportunity.

A clear goal should be to eradicate mammalian pests from the Chatham Islands by 2025.

11. Have we identified the right number of priority species?

(Circle or highlight one) • Too many • **About right** • Too few

**Comments:** We agree with the strategies idea behind selecting priority species as a method of providing landscape scale improvements.

12. Have we identified the right priority species?

Yes. Although given New Zealand's location, and high seabird diversity we feel that seabirds are under-represented in the priority species identified. New Zealand is considered the seabird capital of the world but only 7 seabirds get onto the priority list. Croxall et al (2015) identified seabirds as the most at risk family of birds globally and as such potentially more seabirds should have been on this list.

13. Do you think other species should be prioritised ahead of the ones listed? And why?

No. Despite comments above, we feel the species listed are a good representation of the biota in New Zealand.

14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

Yes, taken together we feel that the Strategy is a useful document in providing direction to threatened species conservation management. In particular the pulling together of the Pest Free NZ vision, battle for our birds, and war on weeds. These key areas are a pathway to improving the status of threatened species and their habitats in New Zealand.

#### Additional comments-

The Taiko Trust feels that the overall the document does not provide enough recognition and support for community groups. Many communities are also working hard to save our threatened wildlife, and we feel that the document at present does not fully convey that message.

This strategy relies on community and private land owner support, and community groups to deliver much of the work. However these two major supporters are always mentioned last, and we feel are not given adequate acknowledgement as one of the key deliverers of this strategy. Communities are one of the key stakeholders

concerned about the state of our biodiversity, and have a clear desire to protect it. Many are doing and inspiring job of this already. So although we are fully supportive of this strategy, we feel better integration with community desires is important for this Strategy to be fully accepted and implemented.

The biggest weakness of the strategy is that it has completely missed the boast on the opportunity that the Chatham Islands offer. From the list of 500 identified priority species 10 species are endemic to the Chathams. This is vastly more than any other similarly sized geographical area of the country. However the Chatham Islands is never mention in the body of the strategy. The Chatham's is vital to the success of the Threatened Species Strategy, and as such should be highlighted in the strategy. In particular the opportunities that the position and geography of the island presents in making it pest free. A goal of this strategy should be to have the Chatham Islands pest free by 2025.

Further, the strategy has not grasped the potential benefits of this country's other larger offshore islands. Instead it has just focused attention down to the Crown owned offshore island nature reserves, most of which are pest free already.

The recent Parliamentary Commissioner of the Environment report "Taonga of an island nation: saving New Zealand's birds" raises some valid issues, which have not been fully addressed in this strategy, and need to be taken into account.

**From:** [REDACTED]  
**Sent:** Tuesday, 25 July 2017 2:19 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
 Organisation: Botany Dept., University of Otago  
 Email: [REDACTED]

q1: No; the vision is too restrictive, considering the large proportion of NZ's indigenous biota known to be threatened, and as indicated in this document. Restoration of viable populations of ALL of the indigenous species known to be 'threatened' or 'at risk', as well as the ecosystems where they naturally belong. Safeguarding a mere 20% of our threatened species by 2030, falls well short of what is needed. I support the vision of 'Predator-free NZ 2050', but again, it must be extended to include mice, weasels, ferrets, and feral cats. Likewise, 'Battle for the Birds' is commendable but urgently needs to be extended to cover ALL public conservation lands and sustained as and when required, based on sound scientific information re the masting of relevant species, including snow tussocks in alpine areas. Similarly, the 'War on Weeds' is commendable but must be extended beyond the 'dirty dozen' to include other aggressive exotics, notably Scotch Heather (a serious threat to the Wilderness Scientific Reserve in western Southland, where a handful of volunteers, alone and which I lead, have been addressing this potentially serious problem. Gorse, Scotch broom, lupin (on braided river beds), silver birch, poplar and rowan should also be included. And why was the decision to eradicate animal pests from Auckland Ids left to July 2017, just pre-election, with negligible funding implications until next year: this urgent situation could have been addressed by now with an earlier decision: the politics of Conservation personified!

q2: Yes, reclassification of all Stewardship lands. These remain vulnerable to alienation and significant losses of unique ecosystems and indigenous biodiversity, e.g., Denniston Plateau lost to opencast mining. Financial allocation to wilding tree control is majorly inadequate to achieve containment/control of a potentially explosive situation: Mid Dome in northern Southland received no funding from the \$4 million allocated last year and hence important earlier gains were lost and the threat worsens (I'm a foundation Trust Member).

q3: Yes, this is fundamental and should be justification for levying inbound tourists to contribute to the funding of its sustainable management. And a case in point is identifying the Haast Tokoeka kiwi as the most threatened of all kiwi and yet the Department approving major disturbance in its critical habitat in the form of installing a pipeline to carry water from the national park immediately above its boundary, down to the coast for export purposes. Moreover, the necessary translocation has no guarantee of success according to local DoC staff.

q4: Most of the tools are known but they need funding to achieve their potential. There is at least one important exception: the promotion of Gene Drive (or gene editing) as probably the most promising method of achieving predator eradication in NZ, whereby the male of the species is genetically modified that all sperm are male-producing and hence the species can be exterminated; the timing depending on the rate of population turnover. This is not 'genetic engineering in the normal sense and, being species specific, there can be no inter-specific transfers. Field-testing on mice in an island situation should be funded and trialled as a matter of urgency.

q5: Yes, see above, outlining the case for urgently funding and trialling Gene editing on mice in an island situation, as the initial stage of the predictably only fail-proof method of achieving 'Predator-free NZ 2050'

q6: The proposed goals should be more explicit in terms of ensuring ecosystem, habitat and indigenous species security/protection, to the maximum extent possible.

q7: Yes, the goals should be heightened so as to ensure that more than 50% of our threatened and at risk indigenous species are considered secure by at least 2025. Do whatever is necessary to ensure the number of threatened species does not further increase. Promote research into all the 'data deficient' species to reduce their number as a matter of urgency.

q8: Yes, assuming those suggested above are also included, but more than identification will be required: adequate funding and appropriate staffing will both be essential to their achievement.

q9: Generally Yes, with inclusion of the additions and amendments contained in this submission.

q10: Ensuring there is adequate predator and weed control beyond the public conservation lands. The Tier One monitoring system should be urgently modified, using sites specifically chosen to adequately represent the natural variation across the landscape, rather than the regular systematic sampling (which was proven to be inadequate when conclusions derived from the National Forest Survey in the early Post-WW2, overseen by Mr Jack Holloway were rejected with later information derived from more specific sampling and analysis by Veblen and Stewart around the 1980s.

q11: too few

q11 comments: See above

q12: Those identified are justified but the number should be increased to include all species identified as 'threatened' or 'at risk' and all these should be assessed in adequate detail for appropriate attention at least by 2030.

q13: Prioritisation should always be based on the perceived level of threat, reviewed at regular intervals, and regardless of their iconic status or cost of management.

q14: The overall framework clearly is inadequate in adequately addressing the extremely serious situation regarding the threat status of our unique indigenous biota and the ecosystems they comprise and habitats provided. This is largely due to the threat of alien animals and plants but also because our conservation lands receive inadequate funding for their sustainable management, but also because any economic values identified on them, be it tourism or direct exploitation, almost invariably takes precedence for their economic returns.

q15: As a professional academic ecologist, who has devoted a lifetime to researching the ecology, conservation and sustainable management of a wide range of indigenous ecosystems and served on many advisory QUANGOs, and recognised in several ways for my services, I do trust my submission will be given serious consideration.



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### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
*(if on behalf of an organisation)*

Email:

Signature:

*(we accept a typed signature if  
no electronic signature)*



**Submission:**

**You can answer all or some of the questions.**

**1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

*No – This vision lacks ambition when it comes to protecting our threatened and at risk native species. It needs to honour New Zealand's international commitments;*

*To restore viable populations of all our threatened and at risk species across their natural range and maintain their genetic biodiversity.*

*This could be encapsulated by a vision based on that recommended by the Parliamentary Commissioner for the Environment's recent Report on the state of our native birds.*

*“The restoration of abundant, resilient and diverse species and habitats across their natural range.”*

*To achieve this, the Strategy's vision needs to be much more ambitious than just aiming to safeguard 20% of our threatened species by 2030. Like Predator Free New Zealand it needs to aim high and look to safeguard all our threatened species by setting clear goals for significant increases in the number of threatened species that will be actively managed for their restoration; i.e.:*

- **All** threatened and at risk species will be protected, not just 20% of them, and
- **All** threatened and at risk species that are conservation dependent will be under intensive management setting them on a path to recovery.

*The vision for Predator Free NZ by 2050 – is supported.. This needs to be expanded to include the other key introduced predators, especially mice, ferrets, weasels and feral cats.*

*“Battle for our Birds” is supported but needs to be expanded so that all of the public conservation land needing predator control is under regular sustained predator control. This would only cost around \$50 million a year (based on roughly 7million ha receiving control once every 3 years with an average cost of \$7 per ha).*

*Until we have eradicated all introduced predators we need to make sure that our threatened species survive and no more species become threatened. To do this we will also need comprehensive, landscape – scale, predator control on land outside of the conservation estate.*

*The “War on Weeds” also needs to be expanded from the dirty dozen as this is less than 4% of the 350 weeds which currently threaten nature. Weeds such as lupin, broom, poplar and gorse are urgently in need of control in some habitats where there are many threatened species such as braided river beds and lowland dryland sites.*

## **2. Are there additional aspects that you think should be included in the vision?**

*The vision should address:*

- *the need to halt the loss of habitats that support threatened species*
- *Increased emphasis on improving our knowledge of the threats to, and conservation status of, species.*
- *Actions for threatened marine species.*

*The vision is focused on land based threatened species and actions to assist them, yet there are large numbers of sea birds threatened with extinction as well as dolphins, whales, sealions, marine fish and invertebrates.*

*The vision and actions of the Strategy need to incorporate an all-of-government approach to protecting threatened and at risk native species. The actions (or lack of action) of many government agencies have significant impacts on our threatened species. All government agencies should have a responsibility under the Strategy to ensure that their policies and actions support the restoration of threatened and at risk species.*

## **3. Do you agree with the characterisation of the value and current state of our native species?**

*Yes Agree with the value of our biodiversity.*

*The Trouble in Paradise section of the strategy needs to recognise the impact of the commercial harvest of threatened species, such as whitebait species and Long finned eels, and the continued clearance of habitats of threatened species for commercial development such as farming intensification, urban expansion and infrastructure such as motorways.*

*The state of our species section needs to be more specific so that it is clear that for example what percentage of our birds, or reptiles, are threatened, and what the trends are for each group of species.*

## **4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

*The Strategy needs to require that all critically threatened species that would benefit from detailed management plans also have dedicated recovery groups that oversee the production and implementation of those plans.*

*The Strategy places too much emphasis on the need to prioritise the work between threatened species. This emphasis appears to be driven by the lack of resources, rather than conservation need. All threatened and conservation dependent species need to be managed for protection and there needs to be flexibility to be able to work on species that may not have been prioritised, but where an opportunity or a necessity arises.*

*Captive management should only ever be a last resort tool, as the priority for threatened species must be conservation in situ.*

*While Fenced sanctuaries serve a useful purpose, they should not be prioritised over conservation of threatened species in situ.*

*As the Parliamentary Commissioner for the Environment's recent report notes, translocations are expensive and risky and should be evaluated against the overall benefit of the species and against the benefit of using the same resources to control predators, or to provide other assistance in the in situ restoration of threatened species.*

*The development of native threatened plant and habitat protection legislation is supported..*

*Support the adoption of a comprehensive National Policy Statement on Indigenous Biodiversity under the RMA.*

*Support greater use of legislation, regulation and policies to ensure that human actions do not further threaten species, for example zero bycatch of threatened species in the fishing industry, no clearance of threatened species habitats.*

*Development of a National Policy Statement on indigenous biodiversity is supported provided it sets bottom lines for biodiversity protection on private land, that will achieve the vision and the goals needed to protect and enhance all our Threatened and At Risk native species and prevent others becoming threatened.*

## **5. Are there other tools we could use to help us achieve the vision?**

*The best possible tool is to ensure that the Department of Conservation is adequately funded to undertake all the steps necessary to restore all species at risk of extinction and to prevent others from becoming threatened.*

*The government needs to also adequately resource science to identify the threats and agents of decline and develop management prescriptions*

*Tools and resources are needed to ensure the monitoring and enforcement of existing legislation, policies and regulations at the central and regional and local government levels.*

*Utilise the Crown's tenure review process to secure high country threatened species habitats and ecosystems in Crown ownership and control.*

*Greater use of DOC's advocacy functions under resource management and other legislation to halt the decline of our biodiversity and enhance threatened species and their habitats.*

*Regulations are needed to require appropriate bycatch mitigation techniques, and transition to modern, low impact, fishing techniques.*

*The war on weeds needs to be expanded from just 13 of the 350 weeds known to be harmful to nature.*

**6. Will the proposed goals help us achieve the vision and assess our progress?**

*The proposed goals need to be considerably more ambitious.*

*There are no goals to achieve enhancing all of our threatened and at risk species, or increasing knowledge about the many data deficient species so that no species are data deficient.*

*There is no goal setting out how progress will be assessed and publicly reported.*

*Goal 4 fails to set a target for assessing data deficient species*

**7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

Amend the goals to include:

- *Enhance the populations of more than 50% of our threatened species so that they are on the road to recovery by 2025,*
- *Manage all threatened species requiring conservation intervention for protection so that no species should become more threatened*
- *All threatened and conservation dependent species should be actively managed for recovery by 2030.*
- *Reduce by kill of threatened species to ensure recovery to non threatened status*
- *Select 230 data deficient species every year so that by 2030 there are no data deficient species.*

**8. Have we identified the right strategic themes?**

The following additional themes should be included:

- *Uniting all Government Agencies in an “all of government” response to threatened and at risk species to ensure all native species thrive.*
- *Maintaining genetic diversity and creating resilience*

**9. Do you agree with our top 10 actions? -**

*Yes with additions and amendments, as set out below.*

**10 Are there any other actions that should be included, and any actions that should be removed?**

*In addition to achieving the Predator Free 2025 goals and the Battle for our Birds response to maasting events,*

*Increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control.*

*Develop a portfolio of priority areas for sustained and effective predator control beyond public conservation lands.*

*Amend Action 7 to; Develop and publish a portfolio of priority areas for threatened species protection on private land.*

*Amend Action 8 to select 1000 rather than 500 of the 3000 data deficient species for assessment.*

*Amend Action 9 to ensure that national recovery planning systems are not only fit for purpose but are also timely and implemented to achieve threatened species goals.*

*Add to Action 10 the development of a system for monitoring and regular public reporting on progress towards the goals.*

*Introduce regulations to achieve zero bycatch of threatened species in fisheries.*

*Expand the War on Weeds to include lupins, broom and willow on river beds and their margins*

*Add an action to identify and take opportunities to preferably purchase, or covenant habitats of threatened species.*

**11. Have we identified the right number of priority species?**

(Circle or highlight one)      • Too many      • About right

• Too few

**Comments:**

*The number of threatened species identified needs to be driven by what is actually required to safe guard our threatened species and ensure that their populations are resilient and thriving rather than fitting the prioritisation to the current lack funding.*

**12. Have we identified the right priority species? No**

*All the threatened species and those that are at risk and conservation dependent should be prioritised for enhancement by 2030*

**13. Do you think other species should be prioritised ahead of the ones listed?**

**And why?**

*Prioritisation should be dependent upon threat status, with account taken of the imminence of threats and be less influenced by the cost of management.*

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

*The overall framework is seriously lacking in ambition.*

*The vision, and consequent framework only proposes to increase the populations of 150 out of 800 threatened species at risk of extinction, and manage 600 out of a further 2,200 species at risk of decline. The vast majority of threatened and at risk populations which need help now are not covered by the Strategy's proposals for action.*

*The strategy focuses on terrestrial species, relying heavily on Predator Free NZ, Battle for our Birds and the limited War on weeds. There is a disappointing lack of focus on out shore and seabirds which are also facing significant threats or marine and freshwater species generally.*

*It fails to commit all government agencies to do their bit to meet the strategy's goals, especially for marine species, or commit the government to ensure that all of the public conservation lands needing predator control are under regular sustained predator control, and that there are effective policies and actions to protect threatened species on private land.*

**From:** [redacted]  
**Sent:** Tuesday, 25 July 2017 5:35 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [redacted]  
Organisation:  
Email: [redacted]

q1: The vision is admirable – the ability to achieve it is doubtful – but that doesn’t mean we should not give it a try.  
q2: Increased regulation (or culling) of exotic hunting species such as deer, pigs, goats etc. to occupy specific areas allowing endemic species to survive in pest free areas of similar terrain and habitat e.g South island dotterel. This should still allow areas for hunting which, even if not my personal taste is a valuable source of revenue for the country. Thoughts on charging visitors for this hunting privilege.  
Any plans to eliminate Plague skink?

q3: Yes in general  
q4: Why was there no summary at the end of each chapter?  
Reading between the woolly words – yes, Who are the Natural Heritage Specialist Groups’?  
I totally support the last paragraph of Prioritisation...etc.  
The law on threatened species on private land needs to be passed.

q5: A better communication strategy from DoC. The impression is, on one hand they seem to not have enough staff and on the other hand seem to be too grand to talk to the average person.  
This seems to be the major breakdown possibly from lack of funds.  
DoC and PF 2050 will need a good publicity strategy to take the public along.  
Is there a strategy to include Federated Farmers in the plan?

q6: Yes, if all the various contributors information is gathered together to assess how progress is being made.  
q7: I hate beaurocracy: I assume Predator Free 2050 will be a central clearing house to gather info on progress and keep the public up to date. See above.

q8: Yes  
q9: Yes  
q10:  
q11: aboutright  
q11comments: What is the situation ref NZ preying mantis?  
q12: Yes: I’m sure there are more but I’m not a scientist. I’m a bit worried in the invertebrates that a number of snails, moths and beetles have no common or maori name.  
What is the situation ref NZ preying mantis?

q13: Not now, but I’m sure more species will be discovered  
q14: Why not just call it a Plan?  
q15: I do not see any comments amongst the wealth of words addressing unforeseen consequences that may occur implementing the plan.

I note that the argument for not introducing a tourism tax concerns the difficulty in collection. However, I see that Auckland Airport is able to extract \$1.29 per pax (+GST) to pay for their second runway. \$20 per head should be no trouble (raising \$60m) and help with the recovery of species to all parties advantage.  
Of course the government could use some of the tourist GST but they could have done that some time ago.



I have been involved in an island project on recovery of species for nearly 10 years. We have visitors from all over the world to view the unique fauna and flora.

Many volunteers have an enormous amount of knowledge that could be used by PF 2050 as part of the strategy. I'm sure this is true over many of the predator free projects and should be nurtured without professional insecurity as they can use money saved for the project.

Education: I'm not sure how much effort is being put into schools but giving children a mindset into the strategy will pay dividends when they see the results as they reach their 30's plus in 2050.

The success and fragility of the two saddleback species I think epitomises some of the strategy problems. Both rescued from near extinction in 1964.

The north island success of a population of 7000 plus birds and south island fragility highlighted by the tragedy at Orokonui Ecosanctuary.

## Submission on New Zealand's Threatened Species Strategy

ESF congratulates the Department on taking this initiative, and particularly encourages their use of pragmatic and objective approaches, targeting scarce conservation resources towards the conservation of New Zealand's Threatened, At Risk and Data Deficient species.

We particularly agree with the working at scale and ecosystem-centred approach, but caution that a careful watch will be required for species that may slip through the cracks due to changes in their threat profile, or that a decline in one of the 6,390 species of conservation concern (Threatened, At Risk or Data Deficient) may go unnoticed, especially as so few of these have any regular population status monitoring.

These comments are structured first on the Strategy's fit in the Departments operating systems, then the overall framework and direction of the Strategy, and then looking at the sections in more detail.

Where no comment is made, it indicates general support by the ESF for that component.

We also thank the Department for meeting with us on 29th June 2016, and our comments include the discussions in this meeting.

### ***Fit with Departmental operating procedures.***

We would like to see this strategy embedded in the Department's operating procedures; particularly the annual planning process, thirdly reporting, and in setting priority for Partnerships and Operations staff when involved in threatened species work.

We would also like it to be clearer how existing Departmental resources (hours and budget) are aligned with this Strategy.

### ***Framework***

The framework of the Strategy (Goals, Themes, Actions), would benefit from further consideration of how they relate to each other. The strength of the strategy would be more clearly conveyed with the use of traditional Vision, Goal and Objective statements.

The general flow of the four sections, as set out in the contents, is good – but becomes lost to some degree in the document.

Sidebar are informative and show what can be achieved when using the approach adopted in the Strategy. However, the large number of sidebars and case studies disrupts the flow and continuity between the sections.

The Strategy presents a selection of Government initiatives, all of which have merit, but lacks any explanation of cohesion between these initiatives and how they together work to achieve a Vision.

ESF thinks that the prominence of Predator Free 2050 as “the springboard for protecting threatened species” overstates its importance and underplays the significant conservation work done to date as New Zealand has a long and proud history of threatened species conservation that pre-dates Predator Free 2050.

There is no date for revision of this Strategy.

#### *Suggested amendments*

A schematic diagram showing the relationship between the key components of the Strategy.

Colour coding the four sections throughout the document.

That a date is given for when this Strategy will be revised.

#### **Vision**

The vision of the Strategy is poorly stated, lacking a defined future state, and confounds purposes with vision. It is further diluted by inconsistencies within the document which appear to conflict with a vision, such as whether there is more importance to preserve genetic diversity in all its myriad subspecies and Evolutionary Significant Units or preserving those species which are most distinct. It is also not clear how the other document components (the Themes, Goals, Actions) support the vision coherently and consistently. Because of this, the focus of the Strategy is unclear.

Of particular concern is the dichotomy of the purpose to “halt decline” and “restore” threatened species. These are two separate ambitions. Trying to achieve both will dilute the focus of the Strategy, as there are many more species in the “halt decline” category than there are resources available, while restoring a species is difficult and expensive, which will take resources away from the “halt decline” ambition.

#### *Suggested amendment*

ESF suggests the vision is refined and clarified, and suggest it is placed under DOC’s mission statement:

*New Zealand is the greatest living space on Earth. Kāore he wāhi i tua atu i a Aotearoa, hei wāhi noho i te ao.*

The vision could be one or two sentences that gives the intent of the Strategy in a way that empowers the document’s audience. The document seems to imply an overall desire to restore threatened species into healthy natural communities using informed approaches and with the aid of New Zealand’s communities. Therefore, ESF suggests something like:

*“New Zealand is a world leader in the conservation of island biodiversity and its unique wildlife and plantlife (or biodiversity) are part of healthy natural communities supported by well-informed Iwi, researchers, businesses, conservation groups and local communities.”*

#### **Goals**

Query – are the species in Goal 2 counted in Goal 1? We understand they are, but this needs to be made clearer.

The four goals are mainly worthwhile and SMART (Specific, Measurable, Attainable, Realistic, Timely), but to some extent fail the test 'what would success look like?'

Goal 4 has the wording "data deficient" which conflicts with later discussions where the goal seems to be interpreted as "increase knowledge of what species to manage and how best to manage them" (eg, in Foundations for Recovery).

Though communities are emphasised throughout the Strategy, and partnerships are a core piece of DOC's work, there is no goal that is specific to them.

The role of DOC's partnerships teams in this strategy also needs to be described as this information will help guide where effort and resources are directed.

### *Suggested amendments*

#### *Goal 1*

Reword to read "Manage 500 threatened species ..."

#### *Goal 4*

Reword to read "... that helps us to better understand which species to manage and how best to manage them."

Also, add a *Goal 5* with wording along the lines of "empower and enable businesses, conservation groups and the community to undertake conservation works that support threatened species and their habitats". This would then strengthen alignment of the Strategy with the Biodiversity Action Plan via its Goal A and National Target 10.

### ***Alignments***

The Strategy generally aligns well with both international and national strategic documents and obligations such as the NZ Biodiversity Action Plan 2016-2020 and the Convention on Biological Diversity's Aichi Biodiversity Targets.

ESF notes that Target 12 of the Aichi Biodiversity Targets references species "most in decline" and that this conflicts to some degree with the restoration approach advocated in the Strategy.

### *Suggested amendments*

ESF suggests an added safety net of prioritised action on those species **at imminent risk of extinction**.

We also suggest that there is a regular 'horizon scanning' for species that may suddenly become more at risk of extinction. We believe this can be achieved through the current process of streaming the threat species revisions into work plans. Incorporating this existing work into the Strategy would give reassurance that species that are not currently listed can be added to the list, if needed.

### ***The state of our species***

It is concerning that for 300 of the 800 (38%) species categorised as Threatened we do not have sufficient information to enable them to be managed. Presumably, this also affects our ability to correctly assess their conservation status. There are also 2846 species classified as Data Deficient with insufficient information to assess their conservation status, and a further 945 species whose conservation assessment is qualified as being Data Poor. This means that there are over 3765 (or around 12%) of assessed species where lack of information is an impediment to their effective management. This is further compounded by the lack of information on the taxonomic status of many species, particularly plants (at least 10% lack a scientific name), invertebrates, fungi, bryophytes, and lichens.

The distribution of many (nearly all) species (excepting birds) is poorly known, with no national mapping scheme (except for birds).

ESF believes there is also a paucity of publically-available information on how to manage our threatened species, such as the learnings from Living Waters example projects, where the species occur and where the priority sites are, and this is hindering the ability of local communities and landowners to take action.

Investing in information and its curation is a critical task that is not adequately captured in this Strategy and the focus on Data Deficient species only partly addresses this issue of lack of information.

There also needs to be a clear definition of what is meant by species that is consistent with its application throughout the Strategy.

### ***We're all part of the solution***

ESF agrees that NZ's indigenous plants and wildlife is a major drawcard for tourists, but that nature-based tourism can have impacts on native species and their habitats. In our view, tourism provides an opportunity to obtaining funding to support conservation, and we wish to see discussions on this progressed. We do have a concern that tourism funding may align only with higher profile sites and species.

ESF finds this section incomplete and suggests that more detail be provided on how to involve and support non-governmental agencies, businesses, communities and committed individuals.

### ***Suggested amendments***

Consideration should be given to how to engage, inform, and support non-governmental agencies, businesses, communities and committed individuals in the actions of this Strategy, by identifying: a) criteria for engagement with DOC's Partnerships team, b) information that will be provided to these groups, and c) the support that is currently available through funding mechanisms, such as the Community Fund, MfE's Environment Fund, and QEII covenanting, and support services, such as avenues for obtaining technical advice and non-government networks, such as Nature Watch, Weedbusters and Wild Eyes. A focus should be on identifying opportunities where this group would ideally be involved (i.e. a list and map of priority areas for involvement), and in identifying support (funds, advice, documentation, etc.) that is available to these groups to undertake meaningful work.

### ***A call to action***

ESF notes that NGOs are conspicuous in their absence from the list of "partners". Is this intentional?

### ***Foundations for recovery***

Query – does Battle for our Birds include treating non-forest areas such as alpine areas, cliffs and drylands? Including these would increase the benefit of this initiative at little cost.

### ***The right tools for the job***

In general, these are a good ‘tool kit’ for getting the job done, but there are tools that are not included – efficient and humane predator control and monitoring achievement being two obvious ones.

### ***Suggested amendments***

ESF suggests that the ‘tool box’ be expanded to include support for undertaking predator control (information, Best Practice, equipment sources, new development updates), monitoring (based on DOC’s Natural Heritage Management System monitoring toolbox?) and reporting tools. These would then better align with the Top 10 Actions.

ESF would also like to see more use of DOC’s TIER 1 and TIER 2 monitoring to inform this Strategy, that this data is analysed annually to provide the necessary information, and that the data and analysis are made publically available.

ESF also believes that reporting achievement of this Strategy needs to be meaningful (are outcomes being achieved) and address Treasury concerns on value for investment. To do this it will require setting meaningful targets, providing the resources to achieve these targets and undertaking effective monitoring to report whether the targets are achieved. We also suggest this monitoring not be overly complex as historically there has been large investment in monitoring, but little of the monitoring data has been analysed or used to date.

### ***Recovery Planning***

Membership of the Natural Heritage Specialist Group will be critical in ensuring the group gives the best advice. How are members selected? For how long? Are there resources to support the group’s operation (including professional fees)? We also would like to note that if the same people who design the recovery actions are part of the Natural Heritage Specialist Group then that narrows the ability for this group to provide new solutions. We suggest that membership be partitioned between active practitioners (field staff), recovery planners, and internal and external experts familiar with the taxonomic group and its management (in either a domestic or international setting).

We support the move from focussing on Recovery Plans (except where species management is dependent on considerable resources) to Taxon Management Plans for groups of related species. We suggest that the information contained within the Species Optimisation project can inform these Management Plans, and are also an ideal delivery planning tool as they are comprehensive, well considered and flexible.

### ***Prioritisation of species recovery***

This introduces management by Ecological Management Unit sites where previously the Strategy talks about species. Considering 220 species are considered secured within EMU<sup>1</sup>, in effect only another 280 species need to be worked on to meet the 500 species by 2025 target.

Query – Of the 100 Prioritised Species, how many are already considered secure under EMU management?

Query – How will the prioritisation schemes be used to guide future work within DOC and to identify shortfalls where community participation is needed?

Query – Can the information on where the c. 1000 EMU are located, the values they are known to contain, their management prescription, and whether they are currently being managed be made available as this could help direct efforts by non-governmental groups?

### ***The plan of attack***

#### *Setting goals*

See earlier comments under **Goals**.

### ***The 150 priority species***

ESF supports a two-pronged approach to this list in which one group are managed due to their iconic status and another group are managed based on an objective evaluation of their need, but the balance of effort between the two groups needs to be carefully considered.

ESF would like to see further detail on the relative resource that DOC has ear-tagged to species in the two categories.

ESF notes this is a major change in approach by DOC and fully supports the adoption of an objective evaluation process.

Further comment is made under the list.

### ***Strategic themes***

ESF suggests this section could be placed before the 'Foundations for recovery' section, as it gives a very important flavour to what is planned to be done.

ESF supports the working at scales and managing ecosystems approach, but would like some comment in the Strategy about how species that do not fit with this approach will be managed (or not).

ESF also supports the focussing beyond conservation land approach, but will this be under the same working at scales and managing ecosystems approach? We also advise caution in how this is implemented as there can be

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<sup>1</sup> <http://www.doc.govt.nz/our-work/monitoring-reporting/national-status-and-trend-reports-20152016/security-of-threatened-and-at-risk-taxa--managed-species/>

unwanted ramifications for landowners, such as areas of land being deemed 'significant' under council plans. For this reason DOC may wish to consider the inclusion of the sentence "Where necessary, statutory processes will safeguard against the effects of development and extraction".

#### *Building our science and knowledge base*

Query – How will knowledge be shared across private and public conservation sectors?

#### *Working together in partnerships*

ESF strongly supports this.

Much of the dialogue is not about formal partnerships. Maybe this should be retitled "Working together"? There is also an emphasis on partnerships with large organisations such as Fonterra and NEXT which can make it difficult for less well-connected members of the public to see their part in this Strategy.

The stated ambition for DOC to show leadership lacks ambition. NZ was once the clear leader in threatened species conservation technologies, but now it is arguably not in that pre-eminent position. NZ (not just DOC) should look to being the acknowledged world leader once again.

#### *Focussing beyond public conservation land*

We feel this should be retitled to "Working across New Zealand" to make it more inclusive and less DOC-speak.

#### **Top 10 actions**

ESF finds that, in general, the Top 10 Actions are government actions and most will not inform those who wish to engage with this Strategy.

They also need better consideration on what success looks like, and these details included in the action: i.e. "Ensure that all national recovery planning systems incorporate the important principles of mātauranga Māori and are effective in enabling successful conservation management of 500 identified species such that by 2025 their populations are all assessed as stable."

ESF suggests dropping actions 4 (Biosecurity 2025) and 5 (Progress key regulatory reforms) as they are already described as part of the Strategy (with the exception of new marine protection legislation) and are primarily Governmental responsibilities.

ESF suggests action 3 (seed banking) should be expanded to include species in ex-situ management as part of a recognised conservation programme to reflect the recent agreement with the Botanic Gardens Association of Australia and New Zealand.

ESF suggests action 8 (select 500 Data Deficient species) is underwhelming and should be modified to support research that informs conservation management, particularly of poorly-known species, by identifying 500 missing pieces of information that hinder our management of species.

"Top 10 actions" begs the question – What are the other actions?



### ***150 priority threatened and at risk species***

ESF acknowledges that such lists are difficult and always represent choices. What is a high priority to one person may not be to another, and hence we support the objective framework adopted for the 100 priority managed species.

We note that if 200 species are managed, over 90% of NZ's genera would be protected, and if we manage the right 500 species, then 100% of our genera are protected.

The list does, however, raise some important questions:

- 1) Will DOC stop current management of some species in order to work on these newly prioritised species?
- 2) Will gaining a position on the list result in a species being managed and those not on the list will not be managed?

One issue is that the species in this list frequently would not be encapsulated under the working at scale or managing ecosystems scale. As such, maybe this list is better viewed as additional species that will be managed outside of the EMU framework to secure them from extinction.

### *The selection algorithm*

In general we support the selection algorithm.

ESF believes there are some tweaks to the weightings used in this algorithm which would create more robust results: Not Threatened category should have a lower weighting (0.3? 0.1?) to reflect their being of no conservation concern. Currently it has the same weighting as Naturally Uncommon and we know that rarity predisposes a species to conservation risk, so the weighting for rare species should be higher than that for Not Threatened species. Species categorised as Recovering should have a lower weighting (0.5?) than those categorised as Declining as their conservation trajectory is markedly different. Species categorised as Naturally Uncommon and Relict should have the same weighting (0.5) as both are classified on the basis solely of limited area of occupancy without known threats to their persistence. Declining should have a higher weighting (0.6?) to distinguish it from the non-declining categories.

We would also like to see the inclusion of a weighting for species qualified as Secure Overseas (1,974 species) as the emphasis must be on preventing global extinction rather than national extinctions.

ESF would like to see some 'horizon scanning' procedure for species that are not currently being managed by DOC, but for which there may be an elevation in extinction risk. Maybe the Endangered Species Foundation list of 10 Most Endangered could help fill that purpose together with the current streaming using the NZ Threat Classification System?

ESF also notes that our knowledge of many species is insufficient to robustly evaluate them in this system. Therefore there needs to be a process of examining the confidence in the underlying information and regularly repeating this listing to encapsulate change. We suggest this process should be re-run every five years.

Query – On what basis were marine, aquatic invertebrates, fungal, and algal species deemed “notable” and thence incorporated into the process?

ESF would also like to see more use of the Species Optimisation data in the final selection of this list – particularly the balance of cost versus gains. Maybe the algorithm should select 500(?) species and then the Species Optimisation data be used to select the final 100 (that are also additional to those already being worked on under the EMU project).

### 50 Notable Species

ESF believes this list should be titled Iconic Species to better reflect the reason for their selection and for consistency with past DOC approaches.

ESF would like to see the justification of why the following species are considered Notable:

*Pittosporum serpentinum* Surville Cliffs pittosporum, kōhūhū tangihua

*Ranunculus paucifolius* Castle Hill buttercup

*Tursiops truncatus* Bottlenose dolphin (we note this species is considered Secure Overseas)

*Paragorgia alisonae* Bubblegum coral

*Powelliphanta superba prouseorum* Large land snail

### Other issues

Should the list of 100 species be corrected for taxonomic bias?

The following table shows the proportion of threatened species in each taxonomic group as a proportion of the overall total of Threatened and At Risk species. If conservation effort was assigned based on this table, which could be viewed as a fair approximation of how conservation resource should be distributed, then 5% of the resource should be expended on birds and 29% on plants (green column). This is obviously very different from both the current situation, and the results in the 100 priority species (yellow column) where there is 7 times as much effort scheduled on bats, nearly 11x the effort on fish and 4x the effort on reptiles (orange column) than would be allocated under a taxonomically unbiased regime. Therefore should the 100 priority species list be corrected to reflect actual requirements?

Taxonomic group	Threatened	At Risk	Total	Proportion of endangered total	100 Priority Species in Strategy	Proportion of Priority Species	Difference between 100 priority species and taxonomic composition
<b>Bats</b>	4	1	5	0.1	1	1.0	7.1
<b>Birds</b>	71	106	177	5.0	11	11.0	2.2
<b>Coleoptera</b>	45	267	312	8.8	7	7.0	0.8
<b>Diptera</b>	1	145	146	4.1		0.0	0.0
<b>Earthworms</b>		32	32	0.9		0.0	0.0
<b>Fleas</b>	1	9	10	0.3		0.0	0.0
<b>Freshwater fish</b>	21	19	40	1.1	12	12.0	10.6
<b>Freshwater Invertebrates</b>	73	89	162	4.6		0.0	0.0

<b>Frogs</b>	4	10	14	0.4		0.0	0.0
<b>Hemiptera</b>	9	49	58	1.6		0.0	0.0
<b>Hornworts and liverworts</b>	16	110	126	3.6		0.0	0.0
<b>Hymenoptera</b>	2	21	23	0.6		0.0	0.0
<b>Land Snails</b>	47	256	303	8.5	16	16.0	1.9
<b>Lepidoptera</b>	49	69	118	3.3	7	7.0	2.1
<b>Lichens</b>	11	178	189	5.3		0.0	0.0
<b>Marine invertebrates</b>	11	320	331	9.3		0.0	0.0
<b>Marine mammals</b>	8		8	0.2		0.0	0.0
<b>Minor invertebrate groups</b>	27	50	77	2.2		0.0	0.0
<b>Mosses</b>	20	48	68	1.9		0.0	0.0
<b>Nematodes</b>	4	3	7	0.2		0.0	0.0
<b>Orthoptera</b>	8	41	49	1.4		0.0	0.0
<b>Reptiles</b>	37	52	89	2.5	11	11.0	4.4
<b>Spiders</b>	3	155	158	4.5		0.0	0.0
<b>Stick insects</b>	1	3	4	0.1	1	1.0	8.9
<b>Vascular Plants</b>	289	749	1038	29.3	34	34.0	1.2
<b>Total</b>	762	2782	3544		100		

#### *Should the 100 Priority Species list be corrected for over-represented groups?*

There is a preponderance of some species groups within the taxonomic groups. For example, coastal *Lepidium* represent 6 (18%) of the 34 plant species on the list. On the full threatened plant list coastal *Lepidium* constitute only 1.4% of species. The underlying bias within the algorithm should be examined to see why this over preponderance was a result. We suspect it is because of differences in the quality of information between this recently taxonomically revised group and other plant genera. We suggest that a maximum number of species per genera be imposed with the maximum being the proportion of species in that genus within their taxonomic group in the threat listing (i.e., no more than 1% of the identified species are a coastal *Lepidium*). The effect of this would be to restrict *Lepidium* (both coastal and inland groups) to 1 species.

#### **Definitions**

The word “threatened” is used with several meanings – sometimes as in the NZ Threat Classification System and sometimes as an umbrella term also incorporating species categorised as At Risk.

The definition given for Nationally Critical on p. 13 is only partly correct. Species can also be classified as Nationally Critical on the basis of speed of decline (Criteria C).

Species is defined on p. 13 as including the genetic variation within a species and the impression is given in this definition that an ambition of the Strategy is to conserve genetic variation, but in other parts of the Strategy emphasis is given to protect species that are most unique.

The “protection” definition could be reworded. “Managing all threats” will require too much resource for little return as many NZ species can cope with a level of threat. We suggest “Managing key threats” is a better

wording. This definition also implies that all populations of a species will be managed. There is simply not enough resource for this to be achieved and we suggest modifying this to managing important populations and promoting the conservation needs of 'unimportant'/unmanaged populations to local communities.

The "enhanced" definition needs a better defined goal – maybe rewording to "long-term viability with minimal ongoing management"?

Query – What will be the balance of resource allocated to active conservation of species versus monitoring of this species, or in monitoring other, unmanaged, species (p. 31)?

### **Minor comments**

The footnote on p. 4 has no anchor point.

p. 10, 2nd column, first paragraph: Weeds have not adapted, they were already adapted when they colonised NZ. We suggest changing "have adapted" to "are adapted". We also suggest that the word "our" be placed before "special".

p.10, 2nd column, final paragraph: The statement "many native plants and animals are protected under the law" could be argued to be untrue. Most species have no protection in their own right unless listed in the Wildlife Act (the Native Plants Protection Act was shown to be ineffective in a court ruling) or if they would be assessed as 'significant' under the RMA or they grow in an area protected under legislation (Conservation Act, Reserves Act, QEII Act).

p.12, chart: This should include At Risk species and be retitled "Proportion of Threatened, At Risk and Data Deficient species by broad taxonomic group"

p. 22, side bar: This obviously needs updating now that myrtle rust has arrived in NZ.

p. 23, bullet point 4: We are not sure that heather control has benefitted native reptiles in Tongariro National Park as we are only aware of the green gecko in this area (and possibly forest gecko) – neither of which, being predominantly forest dwelling species, would greatly benefit from heather being removed. We suggest reference to benefit to native reptiles be removed.

p. 38, side bar: News releases from May 2017 only say that the sea lion breeding group on Stewart Island nearly qualifies as a breeding colony, therefore reporting it as the first breeding colony on mainland NZ is erroneous.

**Submission on Department of Conservation's Draft New Zealand's Threatened Species Strategy****Contributors** (*In alphabetical order*)**Overview**

When the Department of Conservation released its threatened species strategy (“the strategy”) in May 2017 our expectation was that it would set out for public review and comment the Department's plans for the practical steps needed to address its responsibilities as the primary manager of New Zealand's threatened species. Instead we encountered a document that is typified more by its use of catchy phrases and (often superb!) images, but that is largely devoid of either any objective analyses of the full range of factors that threaten our species, or detailed descriptions of the means by which the Department plans to mitigate those threats in the short to medium term.

As a consequence, to us this strategy reads much more as if it were written as a promotional document for the Department rather than to provide a set of visionary plans for the future management of our threatened species. Alternatively, if it was intended to promote the Government's commitment to conservation, then the accomplishments and plans listed therein must be balanced against a number of unfortunate realities, i.e., that during the course of its nine-year term the current Government has, in real-terms, decreased significantly the Department's core biodiversity funding, while greatly increasing expectations for its management of tourism; in addition, through recurrent restructuring it has reduced both its technical expertise and field capacity, both of which are essential for doing the hard work of front-line conservation. In our view, addressing these foundational problems would arguably do more to ensure the safety of our threatened species than many of the actions listed in the strategy.

Despite the overall negative tenor of our comments, we wish to affirm our support for the Department of Conservation, and its role in the management of NZ's biodiversity, as set out so clearly in the Conservation Act and other supporting legislation – in fact, it gives us little pleasure to write such a critical submission. However, given the imbalance of material contained in the strategy, in our view we have a duty as independent individuals with professional experience in a range of aspects of conservation science and practice to voice our grave concerns as to its short-comings.

In the balance of this submission we comment further on:

- The strategy's strong emphasis on generalities and lack of specific detail;
- Its unbalanced focus on predators and weeds, with minimal consideration of other threats;
- The need for strengthened legal frameworks for the protection of threatened species;

- The downplaying of the Department's in-house capacity to carry out robust, evidence based prioritisation of sets of candidate biodiversity projects;
- The value of considering management of representative examples of a full range of New Zealand's natural ecosystems as a powerful adjunct to threatened species management;
- The Department's need to strengthen the way in which it works with communities and, in particular, Regional Councils;
- New Zealand's lack of a single, centralised repository for the storage and dissemination of data describing the distributions and status of our species;
- The relatively conservative priority list, which only contains species on which the Department is already working;
- Suggested additions to the top 10 actions.

### **An emphasis on generalities**

The emphasis in this strategy on the repetition of attractive-sounding catch-cries is encountered immediately in the opening statements by both the Minister and the Director-General, both of whom push strongly the central role to be played in the management of our threatened species by Predator Free 2050. It is further strengthened by the emphasis throughout the rest of the document not only on Predator Free 2050, but also the Battle for our Birds and War on Weeds programs. By contrast, almost no detail is provided as to the other practical steps by which the management of threatened species will be improved or increased, other than the presentation of a number of case studies, and a listing of 150 species that the Department is already managing.

In our view, such a strong reliance on three high-profile programs is a poor substitute for a more strongly technically-based and prescriptive strategy. This shortcoming becomes particularly apparent if a side-by-side comparison is made between this document and the earlier New Zealand Biodiversity Strategy produced in 2000<sup>i</sup>; the latter contained detailed and explicit listings of the actions required to achieve each and every one of its identified, high-level goals, actions that would arguably have significantly improved the status of many of New Zealand's threatened species had they been systematically implemented.

In addition, we note that while Predator Free 2050 has been very effective at catching public attention, both in New Zealand and overseas, it has so far delivered little by way of on-the-ground actions. In addition, the feasibility of this goal is neither proven nor universally accepted, being strongly dependent on the development of novel, and as yet undiscovered tools for the landscape-wide elimination of a whole suite of highly adaptable predator species. For Predator Free 2050 to be achievable these yet to be discovered tools will not only have to be technically feasible, they will have to also receive sufficient acceptance by the broader public to allow their application across *all land of all tenures*. Current opposition to the use of 1080 must raise significant concerns around the wisdom of placing a very high level of reliance on a strategy that is still in such an early developmental stage.

This is not to minimise the value of innovative research; New Zealand has a strong reputation for developing novel and innovative methods, and we should continue with that. But this innovation-focussed activity is no substitute for the immediate and ongoing implementation of well-planned and systematically implemented work to improve the status of our threatened species using existing techniques and tools.

We share similar concerns about the high profile given to the Battle for our Birds and War on Weeds programmes. While these programmes clearly deliver some beneficial conservation outcomes, we would argue that they are not primarily threatened species-focused in either their intent or practice – rather we would view them as simply part of the base-level stewardship management that the Department should be implementing to maintain conservation lands in good condition as required under the Conservation Act.

Finally, we note that while the first two goals listed on page 5 of the strategy are relevant to the enhanced management of threatened species, the third and fourth goals are vaguely specified broad actions that are minimally capable of objective evaluation as to their achievement or otherwise.

### **An unbalanced emphasis on predators – oh, and weeds**

Another consequence of this heavy reliance on simplified catch-phrases is the strong impression that the Department has developed a reactive, and therefore only partial assessment of the full range of threats posed to New Zealand's biodiversity. In searching the document we found 85 occurrences of the word 'predator', 35 occurrences of 'weed', and only 3 of 'browser', 5 of 'pollution' and 4 of 'water quality', indicating to us a fundamental imbalance in the Department's thinking on threats to different species groups. We argue that instead the strategy should have contained a comprehensive, evidence-based assessment of the full range of factors causing declines across the full suite of our threatened species.

For example, on the Public Conservation Land (PCL) that appears to be the main focus of the strategy, we suggest that the Department needs to round out its consideration of threats by paying much greater attention to the negative impacts of introduced browsers including possums, deer, pigs, goats and wallabies, both through their direct impacts on threatened plant species, and their down-grading of habitat value for other species.

Undoubtedly this will require some honest and direct interaction with the hunting fraternity, who at present appear to have scared the Department into a relatively high degree of inaction on the systematic control of browsers in many settings. Evidence of this can be seen in recent offers by the Department to fund the addition of deer repellent to aerial 1080 drops to avoid killing deer, and the informal arrangements made by at least one regional manager to not use 1080 in areas favoured by local hunters, despite their high biodiversity values. We would argue that the Department should be clearly communicating that at sites with high biodiversity values, browsers having significant negative impacts will be controlled to low levels by whatever means are most practicable, while recreational hunting will be relied on as the primary means of control in other areas with lower biodiversity value, but with the Department retaining the right to intervene if required.

A more complete assessment of the factors responsible for the decline of our threatened species outside of PCL is also required. Here consideration is required in particular of the effects on our threatened species of ongoing reductions in the extent and increased fragmentation of lowland habitats, mostly on private land. We also note a complete absence in this document of any consideration of the way in which these effects are likely to seriously threaten the ability of our indigenous ecosystems and species to adjust to global change. Similarly, greater consideration is required of the role played by agricultural intensification in driving the declines of aquatic species, including the effects of the Government-subsidised expansion of irrigation; irrigation also poses threats in some locations to dryland ecosystems and their associated terrestrial species.

Finally, in marine environments, consideration is required of the inadequacy of our Marine Protected Areas (MPAs), which are severely biased towards New Zealand's Sub-Antarctic Islands and inshore rocky reefs around mainland New Zealand; we note that the current draft policy for MPAs makes no provision for water beyond the 12 nautical mile limit. In our view these significant structural shortcomings in our marine protected area network and legislation create a serious vacuum of protection for many marine species, particularly those typical of deep waters, from the existing impacts of pervasive trawling and the potential impacts of expanding mineral and petroleum exploitation.

### **Strengthened legal frameworks**

In our view the strategy gives too little recognition to current legislative ambiguities around the protection of threatened species, and as a consequence, ends up overly reliant on the National Policy Statement (NPS) on indigenous biodiversity that is currently in development under the Resource Management Act 1991. The RMA is a very imperfect document when it comes to the protection of threatened species, with any protective approach under the Act compromised by the mandate of "sustainable management", a much lesser standard than the "absolute protection" prescribed by the Wildlife Act 1953.

In addition, under s 6(c) the RMA only recognises as a matter of national importance the significance of 'habitats', rather than both 'habitats and species'. Strong policies of avoidance of significant adverse effects, etc., could be provided for by an NPS, provided there was the requisite political will. Currently the Supreme Court decision in *Environmental Defence Society Inc v New Zealand King Salmon Company Ltd* [2014] NZSC 38 would see these policies not subject to further dilution in relation to plan making. However, the law in relation to resource consents continues to be unsettled, and renders national policy potentially subject to the "overall broad judgment approach" and dilution in the face of development.

A much better approach in our view would be to clarify and strengthen the legislative protection given to threatened species by reforming the Wildlife Act 1953 such that threatened species, including plants, receive clear and strong legal protection (of both species and habitat) in all areas where they naturally occur.

### **The down-playing of robust, evidence-based prioritisation**

We are also left deeply concerned at the lack of emphasis in this strategy on the use of well-founded conservation science concepts<sup>ii</sup> and supporting tools that have a strongly-documented capability to improve the efficiency of conservation interventions; the most relevant of these are prioritisation tools designed to rank sets of candidate conservation actions for threatened ecosystems and/or species<sup>iii</sup>, including in New Zealand.

These approaches have been the focus of a considerable amount of past work by the Department under its Natural Heritage Management System program, with a systematic approach developed that prioritises the management of ecosystems and threatened species in a fully integrated and evidence-based fashion. However, we understand that while this work was brought close to completion several years ago, it has never been fully implemented and subject to peer review, nor has it yet been used to significantly guide the allocation of funding or resources for biodiversity management by the Department.



In our view, the Department is in no position, given its budget constraints, to ignore the gains that could be delivered through full implementation of such an approach. Some mention is made of this work on page 20, and again on pages 32–33, but we are puzzled as to why it receives no mention in the Department's Top 10 Actions listed on page 40ff., particularly given our comment below on the interplay between ecosystem and threatened species conservation.

This neglect of well-founded and robust prioritisation tools is further emphasised by the actions given greatest prominence in the Top 10 Actions list. The first of these (Battle for our Birds) consists of relatively ad hoc responses to the predator population explosions that result from irregular mast seeding events in *Nothofagus* forests; these represent only a proportion of our forests, and the strong focus on them leaves many of our other high conservation value (conifer-broadleaved) forests without consideration. The highest priority Top 10 action then moves on to provide further endorsement of Predator Free 2050, effectively handing responsibility for the detailed identification of priority actions to an external company that has a focus on only one (predation) of the many factors that undermine the continued survival of our threatened species.

To us, this is a clear abrogation of the Department's responsibility to robustly prioritise its biodiversity management activities in accord with current professional best-practice to maximise the protection of a full range of our threatened species. For this reason, we view it as imperative that robust completion and peer review of the NHMS prioritisation tools be included in the priority tasks listed in this strategy.

### **Ecosystems or species**

By contrast, we were encouraged to read in the strategy the Department's continuing recognition of the interplay between the conservation of ecosystems and of threatened species (pp. 22, 32 ff.). We would encourage the Department to make this link even more explicit, presenting the systematic management of a full range of New Zealand's ecosystems as the fence at the top of the cliff, and threatened species management as the ambulance at the bottom. That is, there is a well-founded recognition in conservation science that species-based management cannot deliver protection to a full range of biodiversity<sup>iv</sup> – too many of our species are unknown, and species-level management would be too expensive to implement across all of New Zealand's myriad of unique species.

Rather, managing representative examples of a full range of ecosystems to a high level of integrity not only minimises the chances of future losses of both known and unknown species, it also meets the needs of many of our known threatened species; in all probability the numbers of species benefitting from such management would exceed the number of species listed as priorities in this strategy. This would then leave threatened species management in a strict sense to focus on those species for which special interventions are required, either because their particularly fragile population status requires intensive intervention (e.g., kakapo), or because their ecosystem habitats have been so modified or reduced in extent as to require highly specific habitat management (e.g., the Chesterfield skink). Perhaps the balance between these two parallel and complementary emphases would be best planned through the production of a strategy for the joint conservation of New Zealand's ecosystems and species; this would arguably provide a much more robust approach to biodiversity conservation planning than the material contained in this strategy.

Given this rationale, we recommend the addition of a new task to the priority list that commits the Department to managing to a high level of integrity, the priority Ecological Management Units (EMUs) identified by its NHMS prioritisation tool, once it is fully implemented. In addition, we urge

the Department to only report prioritised EMUs as being 'managed', when the majority of actions that they require to bring them to a high level of integrity have been implemented. The current approach under which a significant proportion of EMUs are reported as 'managed', despite the Department having implemented only a small proportion of the management activities identified in their full prescription, should be discontinued.

We note that the implementation of such a programme of work to bring a representative range of ecosystems to a high level of ecological integrity, would in combination with other programmes such as Battle for our Birds and War on Weeds, move the Department towards a much more systematic achievement of its statutory responsibilities 'to manage for conservation purposes, all land, and all other natural and historic resources for the time being as held under' the Conservation Act. This would in turn help tie its activities more closely to the core business of the Department as prescribed by Parliament at the time of its establishment.

### **Working with communities**

The strategy has very strong emphasis on the need to engage others to do the work of conservation. However, while this shift in emphasis has clearly increased the overall amount of conservation activity occurring in New Zealand, it carries strong risks of inefficient and wasteful use of limited resources, unless there is a high level of coordination of actions between different players'. In our view the document again resorts to sweeping generalisations about the leadership role played by DOC and Government, which in our experience is not always playing out well at the conservation coal-face.

In particular, those of us working with Regional Councils, collectively the second biggest public funders of conservation actions in New Zealand after DOC, frequently hear that council staff can encounter considerable difficulty in seeking to integrate their work with the Department's activities. Local partnership staff are often too busy to engage, may be ignorant of DOC's national priorities, and/or interact from within a limited local perspective; importantly, they sometimes exhibit a vision that extends little further than simply increasing the amount of conservation activity being undertaken, without a clear focus on the strategic identification and implementation of actions producing the most beneficial outcomes for threatened ecosystems and/or species.

This significant lack of meaningful engagement with at least some of the other major players in New Zealand's biodiversity management, in turn raises more fundamental questions about the intent and scope of this document. If the Department is to place such a heavy reliance on work by other agencies to achieve good outcomes for New Zealand's biodiversity, then a more productive approach to planning would arguably have been to produce a draft strategy jointly with these other players, rather than producing this current document with its strong focus on the Department's actions. An example of such a more agency-neutral approach can be found in the New Zealand Biodiversity Strategy of 2000 that is referenced above. This was produced jointly by the Department of Conservation and the Ministry for the Environment, with input from thirteen other government agencies. As part of such a collaborative approach, the Department should also commit to the systematic and consistent development of regional biodiversity strategies in collaboration with major regional partners, with these strategies also informed by national priorities as identified in a more robust and comprehensive national strategy.

### **The lack of distribution data**

Knowledge of both the historic and current distributions of threatened species is fundamental to their robust management. However, while this draft claims that 'The Department of Conservation (DOC) has detailed knowledge of where many species live', we would add from our experience that much of this information was assembled by DOC's technical staff only with some difficulty, and utilising a broad range of sources, including personal recollections, notebook records, hand-drawn maps, and spreadsheets in widely varying formats. In broader terms, it is of deep concern to us that both the Department and the wider New Zealand conservation community, lack access to a well-maintained, modern repository for the electronic storage and retrieval of distribution data for our threatened species. Compilations of data for some taxonomic groups are held by different Crown Research Institutes and/or museums, and some citizen groups have compiled data for some groups of species (e.g., the New Zealand Plant Conservation Network, Nature Watch NZ). However, using these disparate sources of data to guide management can be hindered both by commercial considerations, and by the inefficiencies inherent in compiling and using data obtained from multiple organisations, often stored in widely varying data formats. As a consequence, attempts to plan and manage threatened species conservation both within and outside the Department are all too often frustrated both by lack of knowledge of, and/or difficulties in accessing accurate data describing their current distributions.

We contrast this with the systematic approach taken to the storage and retrieval of biodiversity distribution data taken by most other western countries. This is perhaps best exemplified by the extensive biodiversity database developed in Australia – Living Atlas of Australia<sup>vi</sup>; a recent offer to New Zealand of free use of the software underlying this system was unfortunately declined. In our view, New Zealand's ongoing lack of a facility for managing such data in an era typified generally as the information age is unprofessional to a level that is embarrassing. It is way past time that the Department, along with a wider grouping of Government science agencies, addressed this issue as a matter of urgency to bring New Zealand's threatened species data management into the 21<sup>st</sup> Century.

### **The selected species**

We can well understand the need to protect iconic species, and accept that some species (e.g., kakapo, kiwi, takahe, whio, etc.) will always feature high up in a priority list because of the way that they capture the public's imagination. It seems odd to us, however, that improving the status of the remaining 100 species requires no commitment to any extra effort on the part of the Department, because all of these listed species are already receiving management. In addition, the total list presented here comprises less than 20% of the 800+ species that the Minister's forward informs us are classified as threatened, and falls far short of the 500 species specified in goal one. Perhaps these discrepancies reflect the significant lack of resourcing of the Department for threatened species management that we highlighted in the introduction to our submission?

### **The priority tasks**

In reading the priority actions set out on page 40, we were struck by their orientation around the continuation or promotion of current actions and activities, without any strong sense of why particular actions were a priority, or how they are aligned around or support particular high-level goals. In addition, and given our comments above, we recommend that the following actions should be added to the list:

1. Clarify the legislative framework for the protection of threatened species by reforming the Wildlife Act 1953 such that threatened species, including plants, receive clear and strong legal protection (of both species and habitat) in all areas where they naturally occur.
2. Continue the full development and implementation of the Department's (NHMS) tool for prioritising the management of New Zealand's ecosystems and threatened species, submit it for peer review, and use it to (i) guide decision making around the deployment of management interventions for the protection of both ecosystems and threatened species by the Department, (ii) encourage community groups to implement additional management in EMUs not managed by the Department to maximise the delivery of benefits for New Zealand's ecosystems and threatened species, and (iii) provide a platform for assessing the ongoing status of ecosystems and threatened species along with the effectiveness of the management efforts undertaken on their behalf;
3. Commit to implementing the comprehensive management required to bring examples of a full range of New Zealand's indigenous ecosystems as represented in DOC's EMUS to a high level of ecological integrity as a first line of defence in protecting a full range of New Zealand's species, and benefitting populations of many of our threatened species.
4. Implement a formalised structure for fostering interaction between the Department of Conservation and other conservation players, including New Zealand's regional and district councils; develop structures and protocols that allow a coordinated approach to the identification of priorities for the management of threatened species and their ecosystem habitats by public agencies and community groups.
5. Develop and maintain a fully-featured and publicly accessible database for the storage, retrieval and display of distribution data for New Zealand's threatened (and other) species, to allow more robust, evidence-based assessments of their distribution and status.

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<sup>i</sup> Anonymous 2000. The New Zealand Biodiversity Strategy. Department of Conservation and Ministry for the Environment, Wellington.

<sup>ii</sup> E.g., Margules, C.R., Pressey, R.L. 2000. Systematic conservation planning. *Nature* 405: 243–253.

<sup>iii</sup> Moilanen A., Wilson K.A., Possingham H. (Eds.) 2009. *Spatial Conservation Prioritization*, Oxford University Press.

<sup>iv</sup> Noss RF (1996). Ecosystems as conservation targets. *Trends in Ecology and Evolution* 11:351.

<sup>v</sup> Parkes, J.P., Nugent, G., Forsyth, D.M., Byrom, A.E., Pech, R.P., Warburton, B. Choquenot, D. 2017. Past, present and two potential futures for managing New Zealand's mammalian pests. *New Zealand Journal of Ecology* 41: 151–161.

<sup>vi</sup> <https://www.csiro.au/en/Research/Collections/ALA>

# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter or contact person:	[REDACTED]
Organisation name: (if on behalf of an organisation)	
Email:	[REDACTED]
Signature: (we accept a typed signature if no electronic signature)	[REDACTED]

### Submission:

You can answer all or some of the questions.

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

No. Clearly protecting species of some groups more than others. A very one-sided emphasis on protecting fauna (mostly birds) from mammal predators, some inclusion of controlling weeds, but unfortunately there is a large gaping hole when it comes to protecting venerable plant species from introduced browsing herbivores. This last

issue is not desirable for the future protection of our largely endemic flora, esp. the terrestrial vascular flora which is most vulnerable.

Agree in theory with an attempt to achieve for the greater number of species, 'smart targeting' and a science based approach for prioritisation.

2: Are there additional aspects that you think should be included in the vision?

A greater emphasis on herbivores (other than opossums) that are impacting our flora namely: tahr, chamois, goats, all species of deer, pigs, and hares. It seems to be a deliberate absence. If we do not tackle this we are only doing half a job and we are required to protect both the flora and fauna.

3: Do you agree with the characterisation of the value and current state of our native species?

It is under-valuing our flora which has many threatened species and many species that were once common and now are limited in distribution and numbers.

4: Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?

5: Are there other tools we could use to help us achieve the vision?

Breakthrough science solution capable of eradicating at least one large herbivore species from the New Zealand mainland.

6: Will the proposed goals help us achieve the vision and assess our progress?

For flora it's hard to think that it would as it is almost completely native fauna biased (except for the inclusion of opossums which would be a good outcome if eradication was achieved).

Uniting against invaders should be clearly defined, which invaders ? clearly predators.

For birds and invertebrates and bats I hope it does, looks promising. there is a real groundswell building which is positive.

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

Yes, equivalent vision and action on the large herbivores, particularly tahr, deer, goats, chamois, hares, which are impacting our forests and alpine areas.

8: Have we identified the right strategic themes?

In regards to collaboration with community groups (of which many are great) working in partnerships with groups such as the Fiordland Wapiti Foundation Conservation Project are compromising to DOC.

9: Do you agree with our top 10 actions?

No. I would like to see high up in the list of something about eradicating and controlling a large browsing herbivore (or two), we could prioritise some species of deer or tahr, particularly feasible is tahr in alpine areas of the South Island and whitetail deer on Stewart Island. In regards to Action 3, we already have an idea about what is happening to many plant species, not much point making another list of threatened plants. And saving seeds is 'ambulance at the bottom of the cliff' and not really a positive action.

10: Are there any other actions that should be included, and any actions that should be removed?

Add eradicating or heavy control of large browsing herbivores in key areas, we could prioritise, whitetail deer, tahr and chamois, e.g.,

- A) Eradication whitetail deer from Stewart Island,
- B) Eradication of tahr from alpine NZ,
- C) Heavy control of chamois and goats in Kahurangi National Park.

These are the aspirational actions on a par with 'predator free' and are probably more realistic in terms of achievement?

11: Have we identified the right number of priority species?

(Circle or highlight one)    • Too many    • About right    • Too few

**Comments:** I think the number may be irrelevant. Long term success I think relies on addressing the cause of decline. You are setting up a never ending train of ambulances at the bottom of the cliff.

12: Have we identified the right priority species?

13: Do you think other species should be prioritised ahead of the ones listed? And why?

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

Only for some of our vulnerable species, birds and insects mainly. There is an absence in terms of dealing to browsing herbivores which impact on our flora severely. The vision, focus and goals is very bias towards animal predators and protecting our fauna, although it does address the flora in small part by including opossums. But the later is definitely not enough especially when you consider our vascular herbaceous flora (I'm especially thinking of our subalpine and alpine flora in particular at threat from tahr, red and wapiti deer, chamois, goats and hares).

The big picture approach that you are taking with protecting the fauna from predators you should be taking with the flora as well (protecting the flora from herbivores, tahr, deer, goats, chamois, hares). Collecting seeds is not enough.

Spreading the effort further beyond public conservation lands is not a good idea given that it is a stretch to protect PCLs now; a good saying is "stick to your knitting". Maybe this should be handled by local authorities, as I can see that it's a good idea in terms of trying to reach key areas outside public conservation lands, e.g., wetlands, remnant ecosystems on bluffs, but if this is more "predator free 2050" only, and not the full treatment then it would be a lost opportunity.

15: Do you have any further comments regarding the draft Strategy that is not covered above?

There is no equivalence in effort to conserve our flora and fauna. We are seriously gearing up for the "predator free 2050". The flora deserves a similar vision and effort.

This strategy appears to be giving-up-the-ghost on our flora and limiting it to monitoring and managing some of the nationally endangered species and a bit of weed control, pines on the edges of the DOC estate. The title of the NZs Threatened species strategy should really be called "Predator Free New Zealand".

I heard in the opening address of the DOC Species Summit, and the CEO mentioned deer just the once, incredibly only in relation to eating birds eggs!



#52

Rec'd  
26 JULY

# New Zealand's Threatened Species Strategy: submissions for consultation

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Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

**Submissions must be received no later than 5pm Monday 31 July 2017**

Anyone may make a submission, either as an individual or on behalf of an organisation.

**Submitter details:**

Name of s  
or contact

Organisat  
(if on beha

Email:

Signature  
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no electro



## Submission:

You can answer all or some of the questions.

### 1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

*No – This vision lacks ambition when it comes to protecting our threatened and at risk native species. It needs to honour New Zealand's international commitments;*

*To restore viable populations of all our threatened and at risk species across their natural range and maintain their genetic biodiversity.*

*This could be encapsulated by a vision based on that recommended by the Parliamentary Commissioner for the Environment's recent Report on the state of our native birds.*

*"The restoration of abundant, resilient and diverse species and habitats across their natural range."*

*To achieve this, the Strategy's vision needs to be much more ambitious than just aiming to safeguard 20% of our threatened species by 2030. Like Predator Free New Zealand it needs to aim high and look to safeguard all our threatened species by setting clear goals for significant increases in the number of threatened species that will be actively managed for their restoration; i.e.:*

- *All threatened and at risk species will be protected, not just 20% of them, and*
- *All threatened and at risk species that are conservation dependent will be under intensive management setting them on a path to recovery.*

*The vision for Predator Free NZ by 2050 – is supported.. This needs to be expanded to include the other key introduced predators, especially mice, ferrets, weasels and feral cats.*

*"Battle for our Birds" is supported but needs to be expanded so that all of the public conservation land needing predator control is under regular sustained predator control. This would only cost around \$50 million a year (based on roughly 7million ha receiving control once every 3 years with an average cost of \$7 per ha).*

*Until we have eradicated all introduced predators we need to make sure that our threatened species survive and no more species become threatened. To do this we will also need comprehensive, landscape – scale, predator control on land outside of the conservation estate.*

*The "War on Weeds" also needs to be expanded from the dirty dozen as this is less than 4% of the 350 weeds which currently threaten nature. Weeds such as lupin, broom, poplar and gorse are urgently in need of control in some habitats where there are many threatened species such as braided river beds and lowland dryland sites.*

### 2. Are there additional aspects that you think should be included in the vision?

The vision should address:

- the need to halt the loss of habitats that support threatened species
- Increased emphasis on improving our knowledge of the threats to, and conservation status of, species.
- Actions for threatened marine species.

The vision is focused on land based threatened species and actions to assist them, yet there are large numbers of sea birds threatened with extinction as well as dolphins, whales, sealions, marine fish and invertebrates.

The vision and actions of the Strategy need to incorporate an all-of-government approach to protecting threatened and at risk native species. The actions (or lack of action) of many government agencies have significant impacts on our threatened species. All government agencies should have a responsibility under the Strategy to ensure that their policies and actions support the restoration of threatened and at risk species.

### 3. Do you agree with the characterisation of the value and current state of our native species?

Yes Agree with the value of our biodiversity.

The Trouble in Paradise section of the strategy needs to recognise the impact of the commercial harvest of threatened species, such as whitebait species and Long finned eels, and the continued clearance of habitats of threatened species for commercial development such as farming intensification, urban expansion and infrastructure such as motorways.

The state of our species section needs to be more specific so that it is clear that for example what percentage of our birds, or reptiles, are threatened, and what the trends are for each group of species.

### 4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

The Strategy needs to require that all critically threatened species that would benefit from detailed management plans also have dedicated recovery groups that oversee the production and implementation of those plans.

The Strategy places too much emphasis on the need to prioritise the work between threatened species. This emphasis appears to be driven by the lack of resources, rather than conservation need. All threatened and conservation dependent species need to be managed for protection and there needs to be flexibility to be able to work on species that may not have been prioritised, but where an opportunity or a necessity arises.

Captive management should only ever be a last resort tool, as the priority for threatened species must be conservation in situ.

While Fenced sanctuaries serve a useful purpose, they should not be prioritised over conservation of threatened species in situ.

*As the Parliamentary Commissioner for the Environment's recent report notes, translocations are expensive and risky and should be evaluated against the overall benefit of the species and against the benefit of using the same resources to control predators, or to provide other assistance in the in situ restoration of threatened species.*

*The development of native threatened plant and habitat protection legislation is supported.*

*Support the adoption of a comprehensive National Policy Statement on Indigenous Biodiversity under the RMA.*

*Support greater use of legislation, regulation and policies to ensure that human actions do not further threaten species, for example zero bycatch of threatened species in the fishing industry, no clearance of threatened species habitats.*

*Development of a National Policy Statement on indigenous biodiversity is supported provided it sets bottom lines for biodiversity protection on private land, that will achieve the vision and the goals needed to protect and enhance all our Threatened and At Risk native species and prevent others becoming threatened.*

## **5. Are there other tools we could use to help us achieve the vision?**

*The best possible tool is to ensure that the Department of Conservation is adequately funded to undertake all the steps necessary to restore all species at risk of extinction and to prevent others from becoming threatened.*

*The government needs to also adequately resource science to identify the threats and agents of decline and develop management prescriptions*

*Tools and resources are needed to ensure the monitoring and enforcement of existing legislation, policies and regulations at the central and regional and local government levels.*

*Utilise the Crown's tenure review process to secure high country threatened species habitats and ecosystems in Crown ownership and control.*

*Greater use of DOC's advocacy functions under resource management and other legislation to halt the decline of our biodiversity and enhance threatened species and their habitats.*

*Regulations are needed to require appropriate bycatch mitigation techniques, and transition to modern, low impact, fishing techniques.*

*The war on weeds needs to be expanded from just 13 of the 350 weeds known to be harmful to nature.*

## **6. Will the proposed goals help us achieve the vision and assess our progress?**

*The proposed goals need to be considerably more ambitious.*



*There are no goals to achieve enhancing all of our threatened and at risk species, or increasing knowledge about the many data deficient species so that no species are data deficient.*

*There is no goal setting out how progress will be assessed and publicly reported.*

*Goal 4 fails to set a target for assessing data deficient species*

**7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

Amend the goals to include:

- *Enhance the populations of more than 50% of our threatened species so that they are on the road to recovery by 2025,*
- *Manage all threatened species requiring conservation intervention for protection so that no species should become more threatened*
- *All threatened and conservation dependent species should be actively managed for recovery by 2030.*
- *Reduce by half the number of threatened species to ensure recovery to non threatened status*
- *Select 230 data deficient species every year so that by 2030 there are no data deficient species.*

**8. Have we identified the right strategic themes?**

The following additional themes should be included:

- *Uniting all Government Agencies in an “all of government” response to threatened and at risk species to ensure all native species thrive.*
- *Maintaining genetic diversity and creating resilience*

**9. Do you agree with our top 10 actions? -**

*Yes with additions and amendments, as set out below.*

**10 Are there any other actions that should be included, and any actions that should be removed?**

*In addition to achieving the Predator Free 2025 goals and the Battle for our Birds response to maasting events,*

*Increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control.*



*Develop a portfolio of priority areas for sustained and effective predator control beyond public conservation lands.*

*Amend Action 7 to; Develop and publish a portfolio of priority areas for threatened species protection on private land.*

*Amend Action 8 to select 1000 rather than 500 of the 3000 data deficient species for assessment.*

*Amend Action 9 to ensure that national recovery planning systems are not only fit for purpose but are also timely and implemented to achieve threatened species goals.*

*Add to Action 10 the development of a system for monitoring and regular public reporting on progress towards the goals.*

*Introduce regulations to achieve zero bycatch of threatened species in fisheries.*

*Expand the War on Weeds to include lupins, broom and willow on river beds and their margins*

*Add an action to identify and take opportunities to preferably purchase, or covenant habitats of threatened species.*

**11. Have we identified the right number of priority species?**

(Circle or highlight one)

• Too many      • About right

• **Too few**

**Comments:**

*The number of threatened species identified needs to be driven by what is actually required to safe guard our threatened species and ensure that their populations are resilient and thriving rather than fitting the prioritisation to the current lack funding.*

**12. Have we identified the right priority species? No**

*All the threatened species and those that are at risk and conservation dependent should be prioritised for enhancement by 2030*

**13. Do you think other species should be prioritised ahead of the ones listed? And why?**

*Prioritisation should be dependent upon threat status, with account taken of the imminence of threats and be less influenced by the cost of management.*

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

*The overall framework is seriously lacking in ambition.*

*The vision, and consequent framework only proposes to increase the populations of 150 out of 800 threatened species at risk of extinction, and manage 600 out of a further 2,200 species at risk of decline. The vast majority of threatened and at risk populations which need help now are not covered by the Strategy's proposals for action.*



*The strategy focuses on terrestrial species, relying heavily on Predator Free NZ, Battle for our Birds and the limited War on weeds. There is a disappointing lack of focus on out shore and seabirds which are also facing significant threats or marine and freshwater species generally.*

*It fails to commit all government agencies to do their bit to meet the strategy's goals, especially for marine species, or commit the government to ensure that all of the public conservation lands needing predator control are under regular sustained predator control, and that there are effective policies and actions to protect threatened species on private land.*



**From:** [REDACTED]  
**Sent:** Wednesday, 26 July 2017 4:00 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
Organisation:  
Email: [REDACTED]

q1: No. It is weak proposal to rank one species above another. All are part of the total ecosystem. While attention might be one one species then at the same time another species is quietly becoming endangered or worse - extinct. The Government needs to increase FUNDING in all it's DOC areas. It need to commit more scientific research and then into IMPLEMENTATION of science results.

It is no good getting good science and then not following up with resources to implement findings.

The vision is weak and unambitious - it should be more urgent and more tightly prioritised.

It needs to start RIGHT NOW - not in some vague future when the present Government might well not be in power. Substantially increase money and resources to it's stated title "Department of CONSERVATION" - not department of exploitation for the tourist,

q2: Urgency - species and habitat need action NOW.

q3: No - arbitrary ranking is not useful. Does a species get more attention because it's attractive and engaging with the public ( kakapo\_) or less attention because it is unseen, tiny or visually unspectacular.

q4:

q5:

q6: Np - not until much more financial commitment is dedicated to the task. The work of preservation of habitat and species is URGENT and only Government has the power ensure it happens. Government needs to enforce laws to stop degradation of our land - without our beautiful and unique species and landscapes there will be no drawcard for tourist. Tourists are part of the problem - note those brining into NZ their bags full of risks to our environment,

q7:

q8:

q9:

q10:

q11: toofew

q11comments:

q12:

q13:

q14: It's a fine-sounding document the fulfils the usual Government aim of projecting action when all it is is a lot of words dreamed up by government officials who spend time doing that instead of out in the real world outdoors that needs the money and help.

q15: Until the Government seriously addresses our current state of affairs and drastically increases funding, staff and resources then nothing positive will occur. The Department of Conservation needs to be much more pro-active in it's advocacy role. It is too focussed on building infrastructure ( tracks, bridges) instead of habitat protection and enhancing.



**From:** [REDACTED]  
**Sent:** Wednesday, 26 July 2017 9:49 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]

Organisation:

Email: [REDACTED]

q1: The aim "to safeguard our vulnerable threatened species" is a good one. I agree that "Everyone has a responsibility and a role to play in protecting our species."

q2: I think that a link to sustainable economic development could be expressed and given form as goals.

q3: Yes.

q4: The manner in which DoC is to work with other central government agencies could be developed here.

q5: The section on regulation notes some constraints on protecting species that suggest a "whole of government" approach is needed to enhance the likelihood of the strategy succeeding.

q6: Yes.

q7: As 868 species are graded as threatened and 2,795 as data deficient, some discussion is required as to why protection is to be limited to 600 species by 2030. I do not think that "Conservation is about making choices" and the sentence that follows are at all adequate. The Minister does not limit her expressed vision in such a way. I support her in that.

q8: Yes. I support the contention that the Government should continue to lead the conservation of our species. I note and commend the role for it in avoiding conflict between competing priorities and agree that sustainable development is a shared responsibility.

q9: Yes.

q10: I see these as current and worthy initiatives especially but I do not believe that they will be adequate to achieve the vision. Other long term goals need to accompany the predator free 2050 objective with related actions.

q11: aboutright

q11comments:

q12: Beyond my knowledge.

q13:

q14: No. I think they provide a realistic framework for DoC to advance its programmes, but that a wider strategic discussion is required about the sacrifices that society will have to make to realise the vision. The incoming government needs to be briefed on what it needs to do to enhance or protect all threatened species.

q15: I want the strategy to succeed.



**From:** [Redacted]  
**Sent:** Wednesday, 26 July 2017 11:12 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [Redacted]  
Organisation:  
Email: [Redacted]

- q1:
- q2:
- q3:
- q4:
- q5:
- q6:
- q7:
- q8:
- q9:
- q10:
- q11:
- q11comments:
- q12:
- q13:
- q14:

q15: The Indiscriminate dropping of Baits Poisoned with 1080, Brodifacoum and Cyanide since 1953 has not eradicated Rats; in fact they are becoming increasingly resistant.

These poisons also kill Possums, Deer Tahr Chamois and Goats who could replace the extinct Moa and the near-extinct Kakapo as Grazers to fertilise the soil.

These poisons also kill Cattle, Sheep Horses, Fish,Cats, Dogs and Birds, including the Native Birds DoC claims to be protecting as well as Insects, including Bees, and Worms.

These poisons are Barbarically Cruel Causing an Agonising Death over days.

Rats Populations Plateau and Nature can Restore the Balance if Allowed to do so.

The interference in this Process has continued the Demise of Native Birds as well as causing Deforestation due to loss of Soil Fertility.

I urge you to please do something to prevent future harm of these species.

**From:** [REDACTED]  
**Sent:** Thursday, 27 July 2017 8:56 a.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Name:** [REDACTED]  
**Organisation:** [REDACTED]  
**Email:** [REDACTED]

q1:

q2: a) Integration with other DOC systems.

The draft strategy notes the NZ Biodiversity Strategy Action Plan 2016-2020 (Page 14). This, along with the DOC Prioritisation Tools, National Policy Statements' pursuant to the Resource Management Act and other mechanisms, are not linked with the strategy in any meaningful fashion. How does the strategy link to these other mechanisms?

b) Context with Site Management.

Protecting important habitats for species conservation in situ is missing, but should be a key part of the vision. Many of New Zealand's rare and threatened taxa occur together on poorly protected, rare and threatened habitat types. Not only is the protection of these habitats a national priority, it is essential if we are to secure the future of many threatened species that mostly occur on private or leasehold land. Protecting such habitats also provides considerable benefits associated with 'economies of scale' and efficiencies associated with managing common threats for numerous threatened species present at one site. Moreover, without this emphasis on habitat protection there is the danger that ex situ conservation will become the norm, and that development which encroaches on core habitat for native biodiversity will continue to be allowed.

c) PFNZ 2050

The exclusion of ferrets, weasels, mice, hedgehogs and cats from the PFNZ2050 aim means that PFNZ2050 will not be enough to deliver the TSS goals. For many species, a failure to include these mammals in the strategy will lead to continuing declines, and may even worsen declines for some species, even with PFNZ2050. In particular, lizards and large invertebrates desperately require development of mouse control methods and experiments to deliver this are desperately needed to sit alongside the PF2050 action point.

q3:

q4: Investment in improving current predator control tools and exploring new ones is not listed as a tool. Its inclusion would be consistent with the PF2050 initiative, but should encompass tools for a broader suite of introduced mammalian predators.

q5:

q6: a) Goal 1: Managing 500 species for protection:

This goal has a focus on the benefits of PFNZ 2050 and many species which will benefit from this approach. However, many other species will not benefit from landscape predator control of a small suite of predators. A particular example which is not covered in the Strategy is the damage done by browsing species. For some browsers we have limited experience at controlling or managing their effects (e.g. hares). The strategy will benefit from describing the split in these categories (those for which predator control will make a difference and those which face other threats). Taxa (e.g. lizards and large invertebrates) that will not benefit from a focus on PFNZ2050 could be given greater consideration in the list of 150 priority species.

b) Goal 4: National Science Challenges: These are very high level and broadly thematically based. They are not designed nor funded at the right level to be able to add to the necessary knowledge for Data Deficient Species. Data Deficient species require surveys and collection of basic field distribution data. The application of Scientific Models

will not work in this context to resolve Data Deficient status. It would be more useful if the Strategy supported targeted biodiversity research within DOC to investigate Data Deficient Species.

c) Goal 4: Role of Research:

o The Goal as written focuses the priority on Data Deficient Species. Conversely the side bar on page 35 which describes the NZ Biological Heritage NSC has a focus on reversing the decline of NZ biological heritage. There is a conceptual gap between the Goal 4 and the NSC descriptor. The Research being described in the sidebar on page 35 is much wider than the Goal and covers different work disciplines and work areas, this need to be addressed.

o The research being described in the NSC needs better direction to meet the needs of the Strategy. There is no specific priority for conservation of indigenous biodiversity and so relying on (or even placing too much emphasis on) the NSC could well be a poor choice. In particular, there are some species for which the threats are not well known or what the key management requirements are and a directed National Science Strategy is required to support these.

o Additionally New Zealand has a significant number of undescribed species and complex species relationships taxonomic and phylogenetic research is needed to tease these out. This will confirm that taxonomically indeterminate species are valid species that warrant management attention and will ensure that the actions of the Strategy are focused, and founded on robust research results.

q7:

q8: Protecting important habitat for species conservation in situ is missing, but should be a key strategic theme. Without this emphasis on habitat protection there is the danger that ex situ conservation will become accepted, and that important habitat for native biodiversity will continue to be irrevocably destroyed by development projects.

q9: b) Action 7: The identification of regional “hot spots” is supported. These may be driven by high levels of endemism or diversity. Examples include:

- For plants in Southland endemism “hot spots” include Stewart Island/southern Southland coast, alpine Stewart Island, alpine Fiordland, Eyre Mtns/Northern Southland and southern ultramafic geology sites.
- For plants in Southland diversity “hot spots” include Masons Bay, Lake Manapouri & Te Anau lakeshores, Eastern Fiordland (e.g. Borland Saddle/Mt Burns), Northern Southland Mtns (e.g. Garvie and Eyre Mtns).

c) Action 8: (relating to Data Deficient Species). This action is not specific enough to be of value. It should be rewritten as: “There will be less than 100 Data Deficient Species by 2025”. It is only with specific language such as this that will prioritise the additional necessary resources to achieve the action. Prioritising work on Data Deficient species is necessary as while New Zealand still has a large number of Data Deficient Species we are unable to accurately report on the state of our biodiversity.

d) Action 9: There is a lack of clarity here about what national Recovery Planning Systems are going to be. We support them being fit for purpose but what does this mean? In particular, there is ongoing debate about the role of technical advisory groups (with a strict technical focus) compared to Recovery Groups (which also have an advocacy role). A clear statement that Technically focused are preferred compared to Recovery Groups (or vice versa) is required. The direction the department wishes to take should be explicit in the strategy.

q10: a) The major gap in the actions is a lack of acknowledgement of the significant threat that climate change is having on our biodiversity now. We have concrete examples where this is happening (eg Yellow-eyed Penguins, Cobble skink and *Deinacrida connectens*) and it is not reflected in the top 10 actions. Action 5 and to a lesser extent 10 need to be reframed to include specific mentions and responses to the impact of climate change on our biodiversity.

b) Action 10 needs to be refined. Currently there is a lack of clarity about what “comprehensive” means. Does this mean all species in the strategy are to be monitored or that a properly constructed monitoring scheme which includes treatment and non-treatment areas to be able to measure the difference made by management is going to be implemented? Monitoring of additional threatened species, including all Nationally Critical species, is required to make sure we know of any changes in status in a timely fashion so that management can be undertaken. Currently monitoring of species is ad-hoc and generally not nationally co-ordinated.

q11: outright

q11comments:

q12: The inclusion of island endemics which are protected by isolation is leading to the exclusion of many species which should be included in the TSS. For example Black robin, NZ Storm Petrel, Campbell Island teal are all only found on protected off shore islands. There are no actions in the strategy which protect or advance the conservation of these sites.

Similarly, the inclusion of non-threatened species in the list of 150 priority species, such as those ranked as Recovering or Relict, means that species which are desperately in need of conservation focus are not being included.

q13: The draft list of invertebrate species is a curious spread, full of puzzles and inconsistencies. Many large bodied invertebrates which are likely to be susceptible to predators which are not covered by the PFNZ2050 strategy (eg mice) are omitted.

Examples include:

- The Nationally Endangered weevil species *Hadrmaphus tuberculatus*. This taxon [REDACTED], has a comprehensive recovery plan, an Operations work plan and a high public profile.
- The list is also includes 16 species of native snail compared to only seven beetles – despite New Zealand's beetle fauna being over 95% endemic.
- The lack of alpine species and spiders.

q14:

q15: Time Limited Nationally Critical Species

We suggest the addition of a list of species on the cusp of extinction. These are Nationally Critical species but where time is more of a factor than other Nationally Critical species – it is from this group we may have a species extinction within 5 years unless something changes dramatically.

These are species which do not appear to be listed in the current listed 150 but which are species that need a 'game changing' input from somewhere to prevent extinction in the next five years.

On the surface the strategy does not seem to focus on such species but in the vision this is justified in the sentence: This Threatened Species Strategy aims to safeguard our vulnerable threatened species

Examples include:

- Orange-fronted parakeet – Island translocations do not seem to be successful, wild population is only known in three valleys and is not responding to current predator control regimes and is now dependent on a very small captive population
- *Metrosideros bartlettii* – only 13 adult plants and could be wiped out by myrtle rust
- *Hadrmaphus tuberculatus* – very low numbers, only found in one place – one fire will destroy the species or ongoing predator pressure is likely to wipe out within 5 years
- *Pimelea actea* – very low numbers and habit is only on private land and subject to development or deterioration
- Alborn skink – only known from few individuals – very restricted distribution that we know of
- Cobble skink – only known from one site – storm surge has destroyed habitat – now only in captivity, awaiting relocation back to a safer site.

# New Zealand's Threatened Species Strategy: submissions for consultation

#57

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
*(if on behalf of an organisation)*

Email:

Signature:

*(we accept a typed signature if  
no electronic signature)*

Taupo Branch

Royal Forest and Bird Protection Society



## Submission:

You can answer all or some of the questions.

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

*No The vision should be to **restore viable populations of ALL our threatened and at-risk species** across their natural range and maintain their genetic biodiversity.*

*The vision needs to honour New Zealand's international commitments and be based on the recommendations of the Parliamentary Commissioner for the Environment's recent Report on the state of our native birds.*

*Predator Free NZ by 2050 needs to be **expanded** to include the other key introduced predators, especially mice, ferrets, weasels and feral cats.*

*"Battle for Our Birds" needs to be **expanded** so that all of the public conservation land needing predator control is under regular, sustained predator control. We need to ensure that our threatened species survive and no more species become threatened. To achieve this we will need comprehensive, landscape-scale, predator control on land within and outside of the conservation estate.*

*Plant Pests control needs to be expanded from the dirty dozen commonly included in the "War on Weeds". This is less than 4% of the 350 weeds which currently threaten nature. Weeds such as lupin, broom, poplar and gorse are urgently in need of control in some habitats where there are many threatened species such as braided river beds and lowland dryland sites.*

2: Are there additional aspects that you think should be included in the vision?

*The vision should include:*

- *The need to halt the loss of habitats that support threatened species*
- *Increased emphasis on improving our knowledge of the threats to, and conservation status of, species.*
- *Actions for threatened marine species.*

*The vision and actions of the Strategy need to incorporate a whole-of-government approach to protecting threatened and at-risk native species. Currently the actions (or lack of action) of many government agencies have significant impacts on our threatened species.*

***All** government agencies should have a responsibility under the Strategy to ensure that their policies and actions support the restoration of threatened and at risk species*

3: Do you agree with the characterisation of the value and current state of our native species?

*Yes I agree with the value of our biodiversity.*

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

5: Are there other tools we could use to help us achieve the vision?

*The best possible tool is to ensure that the Department of Conservation is adequately funded to undertake all the steps necessary to restore all species at risk of extinction and to prevent others from becoming threatened.*

*This includes instructing Department of Conservation to carry out its statutory function under the Conservation Act, Fisheries Protection Act and the RMA to advocate for biodiversity on private land thus ensuring the large number of threatened species living there are protected in situ.*

*Utilise the Crown’s tenure review process to secure high country threatened species habitats and ecosystems in Crown ownership and control.*

6: Will the proposed goals help us achieve the vision and assess our progress?

*The proposed goals need to be much more ambitious. It is disappointing that this glossy publication has been produced at significant cost when there have been numerous previous similar documents. Much better would have been to use the time and resources to actually get on with the important work necessary. Extinction does not wait.*

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

*Amend the goals to include:*

- *Enhance the populations of more than 50% of our threatened species so that they are on the road to recovery by 2025,*
- *Manage all threatened species requiring conservation intervention for protection so that no species should become more threatened*
- *All threatened and conservation-dependent species should be actively managed for recovery by 2030.*
- *Reduce by kill of threatened species to ensure recovery to non-threatened status*
- *Select 230 data deficient species every year so that by 2030 there are no data-deficient species.*

8: Have we identified the right strategic themes?

*The following additional themes should be included:*

- *Uniting all Government Agencies in a “Whole of Government” response to threatened and at-risk species to ensure all native species thrive.*
- *Maintaining genetic diversity and creating resilience*



9: Do you agree with our top 10 actions?

10: Are there any other actions that should be included, and any actions that should be removed?

*In addition to achieving the Predator Free 2025 goals and the Battle for our Birds response to maasting events:*

*Increase landscape-scale predator control so that **all** of the public conservation lands needing predator control are under regular, sustained predator control.*

*Develop a portfolio of priority areas for sustained and effective predator control beyond public conservation lands.*

*Amend Action 7 to: Develop and publish a portfolio of priority areas for threatened species protection on private land.*

*Amend Action 8 to: Select 1000 of the 3000 data deficient species for assessment.*

*Amend Action 9: To ensure that national recovery planning systems are not only fit for purpose but are also timely and implemented to achieve threatened species goals.*

*Add to Action 10: the development of a system for monitoring and regular public reporting on progress towards the goals.*

*Introduce regulations to achieve zero bycatch of threatened species in fisheries.*

*Expand the War on Weeds to include lupins, broom and willow on river beds and their margins*

*Add an action to identify and take opportunities to preferably purchase, or covenant habitats of threatened species.*

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right • **Too few**

**Comments:**

12: Have we identified the right priority species?

**No**

*All the threatened species and those that are at-risk and conservation-dependent should be prioritised for enhancement by 2030*

13: Do you think other species should be prioritised ahead of the ones listed? And why?

*Prioritisation should be dependent upon threat status, with account taken of the imminence of threats and be less influenced by the cost of management.*

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

*The overall framework is seriously lacking in ambition.*

*It fails to commit:*

- *All government agencies to do their bit to meet the strategy's goals, especially for marine species*
- *The government to ensure that all of the public conservation lands needing predator control are under regular, sustained predator control*
- *To effective policies and actions to protect threatened species on private land.*

15: Do you have any further comments regarding the draft Strategy that is not covered above?

**From:** [REDACTED]  
**Sent:** Thursday, 27 July 2017 4:01 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]

Organisation:

Email: [REDACTED]

q1: No - it needs to protect ALL of our threatened and at risk species, not just 20%, and maintain their genetic biodiversity by not diminishing natural habitats.

The vision for Predator Free NZ by 2050 is supported, but is it progressing effectively? And there is the need to expand to include ferrets, weasels and cats.

Battle for Birds & War on Weeds both need to be expanded

q2: Habitat supporting threatened species is vital and we need to stop:

\* continued clearance of habitats for commercial development (including farming) & urban development

\* logging native trees

\* mining conservation land

\* marine exploration for oil & gas

There is not enough emphasis on threatened marine species - numerous sea birds, dolphins, whales, sea lions, marine fish & invertebrates.

q3: Yes

q4:

q5: Ensure that DOC is adequately funded to proceed - restoring ALL at risk species, and preventing others from becoming threatened,

q6: It is rather weak - there are no specifics on how this will be done or reported.

And what does 'protection' actually mean?

q7: Increase the goal to enhance the populations of at least 50% of threatened species.

Reduce by-kill of threatened marine species to ensure recovery to non-threatened status.

Set goal on data deficient species, so by 2030 there are NO data deficient species.

q8:

q9: yes

q10: 1. Need to eradicate ALL mammalian predators 5. Introduce regulations to achieve zero by-catch of threatened marine species. Expand War on Weeds - particularly invaders of river beds & margins (lupin, broom, willow) 8. Need to select ALL (or at least 1,000) of the 3,000 data deficient species for assessment.

10. Incorporate regular Public Reporting on progress.

q11: toofew

q11comments:

q12: Good start, but ALL threatened and at risk species should be selected for enhancement by 2030

q13: Priority (if you must) should be dependent on threat status

q14: This is a big task, but if everybody is determined to focus and work to the common goal - it can be done

q15: Genetics can give a lot of information on the health of a species.

Healthy habitats are VERY important for the health and survival of a species

# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

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### Submitter details:

Name of submitter  
or contact person:

[Redacted]

Organisation name:  
(if on behalf of an organisation)

West Coast *Tai Poutini* Conservation Board

Email:

[Redacted]

Signature:

(we accept a typed signature if  
no electronic signature)

[Redacted]

**Submission:**

**You can answer all or some of the questions.**

**1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

The West Coast *Tai Poutini* Conservation Board considered the above document at its recent Board meeting on Friday 21 July. The Board is in Broad support for the Strategy and its linkages to Predator Free 2050, and the underpinning species management plans. More specific comments are given below and are addressed by relevant section in the document.

**2: Are there additional aspects that you think should be included in the vision?**

We consider that the whole concept of “War on Weeds – the Dirty Dozen” is encouraging however there should be regional flexibility to adjust for the worst environmental weeds as the weed threat may vary with geographical location. In addition, the illegal release of game animals is a continuing and increasingly serious issue and there needs to be stricter legislation in place to prevent this practice.

**3: Do you agree with the characterisation of the value and current state of our native species?**

We note the lack of information relating to approximately 3000 species and the possible need for reclassification of these. It is a concern of the Board that there is a danger of species management without appropriate consideration of the ecosystem in which the particular species exists and would urge broad consideration of both e.g. the species may not be critical or endangered by numbers but the ecosystem, which is necessary, may be threatened.

The Board gives strong support for fishing and natural resources exploration restrictions for Maui’s dolphin protection.

**4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

The strategies outlined in this section are fully supported, as is the proposal to establish “Natural Heritage Specialist Groups”. It is hoped that these groups will take a broader consideration on species and ecosystem management.

**5: Are there other tools we could use to help us achieve the vision?**

There is strong support for the implementation and ongoing commitment for New Zealand's participation in international agreements to protect biodiversity.

**6: Will the proposed goals help us achieve the vision and assess our progress?**

The overall goals are supported but would urge that specific criteria are set for species protection and that the management outcomes are quantifiable. Publication of results should be encouraged in international peer reviewed journals and not 'buried' in internal reports.

**7: Are there alternative goals that you think will better achieve the vision and assess our progress?**

**8: Have we identified the right strategic themes?**

The overall concept of developing innovative strategic technologies for predator control is strongly supported. There is support for whole genome sequencing (as indicated for the Kakapo) however, it has to be realized that data from whole genome sequences are complex and that sequence analysis and assigning of gene information would have to be ongoing post 2018 when the sequencing programme is completed to be of any significant value.

For strategic development, information must be built on a sound knowledge and science base, which would require adequate long-term funding for both research, analysis and implications at both species and ecosystem management levels.

The working of the Department of Conservation with organizations that protect land and species by covenants is strongly supported and pest and weed management strategies (in particular) should be coordinated between the Department of Conservation and covenanters.

**9: Do you agree with our top 10 actions?**

The 10 actions are fully supported.

10: Are there any other actions that should be included, and any actions that should be removed?

**Foundation for recovery.**

The broad platforms indicated are strongly supported. The Board supports the use of 1080 as the only practical pest management tool available at present and would encourage additional research to fund alternatives to the use of 1080.

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • **About right** • Too few

**Comments:**

12: Have we identified the right priority species?

The provision of 150 species as an Appendix to this document is welcomed and provides important information. It would be interesting to know if there are any inter-relationships between the species as a broader concept of ecosystem management?

13: Do you think other species should be prioritised ahead of the ones listed? And why?

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

**15: Do you have any further comments regarding the draft Strategy that is not covered above?**

In addition to the comments specifically relating to the consultation document the Board would appreciate the following to be considered.

- Although climate change is mentioned in the document there appears to be a lack of strategic development in relation to this issue. This would include issues such as for example, increasing marine temperatures, which may influence fish stocks and fish migration, thereby modifying food availability for seabirds. Changes in sea level rise may modify terrestrial habitats. As climate is modified weed, pest and disease distribution may change and should be considered as a strategic issue.
- The inter-relationship between urban and rural environments and the creation of indicators of interactions.
- Intra-governmental department collaborations to enhance effectiveness of species management and biosecurity.
- Threatened species management should be based on continuous monitoring and enforcement, which was recently identified as 'requiring for improvement' for the Department of Conservation (Last Line of Defence, 2017. Marie Brown, Environmental Defence Society). It is noted that there is no information relating to enforcement in relation to the "Species Strategy" which the Board believes is an essential component of species management.
- Any pest management strategy development must not alienate or adversely impact on members of the public and access to the conservation estate.
- There is no indication for the development of a 'Roadmap' for the overall strategy.

Thank you for the opportunity to make a submission.

[Redacted signature]

Chair  
West Coast *Tai Poutini* Conservation Board





QEI National Trust  
Open Space New Zealand  
Ngā Kalrauhi Papa

26 July 2017

Threatened Species Strategy  
Department of Conservation  
PO Box 10420  
Wellington 6143

Dear Sir/Madam

### **Submission on Draft Threatened Species Strategy**

Thank you for the opportunity to comment on the draft threatened Species Strategy.

The Queen Elizabeth II National Trust (the National Trust) is an independent charity established forty years ago under its own Act to facilitate the protection and enhancement of natural and cultural heritage on private and leasehold land for the benefit of present and future generations of New Zealanders.

The principal means by which the National Trust achieves this objective is through establishing open space covenants with individual landowners over land or bodies of water to ensure protection in perpetuity of natural or landscape features of aesthetic, cultural, recreational, scenic, scientific or social value.

Covenant agreements run with land title and are legally binding on present and future owners and occupiers of the land. Such covenants are 'indefeasible' once registered and provide a very high level of protection as demonstrated through recent case law. Currently there are 4,354 covenants registered on private and leasehold land across New Zealand providing protection over 168,885 hectares.

With the introduction of the 'New Zealand Biodiversity Strategy' in 2000 and the 'National Priorities for Protecting Rare and Threatened Native Biodiversity on Private Land' in 2007, the National Trust has put a high priority on securing covenants that protect indigenous vegetation and/or habitats that meet one of these four national priorities.

#### **National Priority 1**

To protect indigenous vegetation associated with land environments, (defined by Land Environments of New Zealand at Level IV) that have 20 per cent or less remaining in indigenous cover.

#### **National Priority 2**

To protect indigenous vegetation associated with sand dunes and wetlands; ecosystem type that have become uncommon due to human activity.



QEII National Trust  
Open Space New Zealand  
Ngā Kaiāhūi Papa

### **National Priority 3**

To protect indigenous vegetation associated with 'originally rare' terrestrial ecosystem types not already covered by priorities 1 and 2.

### **National Priority 4**

To protect habitats of threatened and chronically threatened indigenous species.

Almost all new covenants satisfy at least one national priority, some have all four, with the balance protecting cultural heritage, social values including recreational or educational activities, landscape or geological features.

Many the National Trust covenants have threatened species. Some covenants protect the last known populations of species eg. *Ceratocephala pungens* and *Olearia adenocarpa*. Others protect the only known protected site for our rarest species. *Simplicia Félix* in North Otago is the only known South Island site for this grass and *Pachycladon exile*, is a herb associated with limestone.

In registered covenants,

- six species of birds, one species of freshwater fish and one bat species are ranked nationally critical.
- Six species of birds, two freshwater fish species are ranked nationally endangered.
- Thirteen species of birds, four freshwater fish species, one frog species and one bat are ranked nationally vulnerable.
- Eighteen species of birds, nine freshwater fish and one frog are declining
- Five species of birds and one freshwater fish species are ranked naturally uncommon.
- Thirteen bird species are ranked recovering
- Two species of birds are ranked relict.

Of the 39 plant species prioritised in the Threatened Species Strategy the National Trust has

- Ten nationally critical plant species
- Three nationally endangered plant species
- One nationally vulnerable plant species

### **Vision**

The vision of the strategy '.....to safeguard our vulnerable threatened species....' is commendable however this is only part of what we expect in the vision and the message is lost by an excess of words. A vision should be a simple, short statement which is memorable and ambitious.

We suggest the vision incorporates the vision of the New Zealand Biodiversity Strategy 2000-2020 and the New Zealand Biodiversity Action Plan 2016, Target 12;



QEI National Trust  
Open Space New Zealand  
Ngā Kalrauhi Papa

### **Suggested vision**

'By 2025, a full range of New Zealand's indigenous ecosystems thrive, the extinction of 150 known most threatened species has been prevented, and the conservation status, particularly of those most in decline, has been stabilised or improved'.

### **Focus**

The five themes stated in the focus of the strategy are all relevant to the National Trust, however it will be difficult for these foci to be implemented given that there is no increase in funding for this strategy.

The National Trust understands that cabinet is to approve the final version of the strategy which offers an opportunity for it to be considered as a 'whole of government' strategy with additional funding allocated.

### **Theme 1: Uniting against invaders on a landscape scale.**

Existing programmes such as Predator Free (PF) 2050, Battle for the Birds and War on Weeds undoubtedly have benefits to threatened ecosystems and species. The National Trust believes, however, that as well as controlling predator species targeted in PF 2050, other predators such as cats, hedgehogs, and mice should also be targeted where they are impacting on threatened species. Browsing/rooting animals such as deer, pig, goat, possum and wallaby, hare and rabbit populations in some regions are severely impacting on threatened species and their habitats.

The National Trust believes that more scientifically researched and focused targets for each situation would be more effective in reducing the threat status of many species. There is little recognition of the critical role private landowners play in the protection of native species.

### **Theme 2: Managing ecosystems at scale to protect species**

The National Trust agrees that managing threatened species within the previously identified Ecosystem Management Units (EMUs) will help to prevent more species from declining as well as protecting threatened species from declining further or improving their threat status. A holistic approach to managing EMUs using the existing programmes (Battle for the Birds, War on Weeds and a more expanded predator/browsing control programme) would help achieve the purpose of the strategy.

There is no mention of management of threatened species which occur outside of these areas on public land and this needs to be recognised as a critical part of the strategy and resourced as such.

#### **Theme 4: Focusing beyond public conservation**

As indicated in the strategy, many threatened species are found outside public conservation land. Ngā Whenua Rāhui and the Queen Elizabeth II National Trust are mentioned as ‘an important conservation mechanism for ensuring the long-term persistence of populations of threatened species on private land.’ Legal protection, and in most cases fencing out stock, are important actions to protect threatened species, however, many threatened species on private land are in highly modified habitats and therefore require active management to enable them to persist and flourish.

Currently neither private landowners nor the National Trust are resourced to support important management activities such as pest animal or weed control or manage threatened species in covenants.

Historically, the Biodiversity Condition and Advice Funds provided funding in partnership with the National Trust and other agencies to manage threats to the biodiversity in covenants including threatened species management.

Since the replacement programmes, the Community Conservation Partnership Fund and subsequent Department of Conservation Community Fund, the focus of the National Trust’s work, supported by these funds, has largely been limited to a time bound project controlling weeds species – particularly the ‘Dirty Dozen’. These funds have broader focus to support community recreational and historic heritage projects in addition to biodiversity projects. This has resulted in the National Trust facing increasing competition for these funds and we believe the considerable commitments by the landowners is not recognised.

While the National Trust has secured some funding from the Lotteries Environment and Heritage Fund for threatened species work; kiwi in Whangarei, kokako in Bay of Plenty and Cook Strait weta and kakariki in Nelson/Marlborough, funding is difficult to secure and cannot be relied on for the work needed to support threatened species.

Covenantors have made an estimated financial contribution of between \$1.1 to 1.3 billion to protect New Zealand’s biodiversity since the National Trust was established forty years ago. The cost of fencing alone to landowners is estimated to be \$27 million (in 2016 dollars). Furthermore, by protecting the biodiversity on their land, landowners have foregone alternative land uses with an associated opportunity cost of between \$443 and \$638 million.

While this investment is impressive, landowners are increasingly facing the challenges of climate change, increasing predator numbers, ecological weeds and new biosecurity threats largely with any support mechanisms.



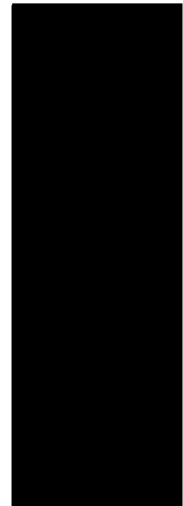
**QEII National Trust**  
Open Space New Zealand  
Ngā Kaiarauhi Papa

The National Trust recently established the 'The Stephenson Fund' for the management of registered covenant. The fund is set at a modest \$150,000 per annum, however if combined with additional funding the National Trust can make a difference to threatened species management in covenants.

The National Trust is uniquely placed to advance the objectives of the Threatened Species Strategy. We provide a cost-effective and enduring mechanism for protecting areas of biodiversity. Additional funding is urgently needed for managing and supporting threatened species on some of the 4,354 QEII National Trust covenants, working with willing landowners.

Yours sincerely

Mike Jebson  
Chief Executive





**SUBMISSION: DRAFT NEW ZEALAND'S THREATENED SPECIES STRATEGY**

**To: Department of Conservation  
PO Box 10420  
Wellington 6143**

This Submission is from:

**Te Whakakitenga o Waikato Incorporated**  
C/o Waikato Raupatu Lands Trust  
PO Box 481  
Hamilton

# INTRODUCTION

1. This submission is made on behalf of Te Whakakitenga o Waikato Incorporated (formerly known as Waikato-Tainui Te Kauhanganui Incorporated) on the draft New Zealand's Threatened Species Strategy.
2. Te Whakakitenga o Waikato Incorporated (**Waikato-Tainui**) is the governing body for the 33 hapuu and 68 marae of Waikato Tainui and manages the assets of Waikato Tainui for the benefit of over 70,000 registered tribal members.
3. Waikato-Tainui makes this submission on behalf of our tribal members. The rohe (tribal region) of Waikato-Tainui is bounded by Auckland in the north and Te Rohe Potae (King Country) in the south and extends from the west coast to the mountain ranges of Hapuakohe and Kaimai in the east. Significant land marks within the rohe of Waikato include the Waikato and Waipaa Rivers, the sacred mountains of Taupiri, Karioi, Pirongia and Maungatautari, and the west coast of Whaingaroa (Raglan), Manukau, Aotea and Kawhia moana. We acknowledge and affirm the intrinsic relationship of Waikato-Tainui with our natural environment.

# SUMMARY OF POSITION

4. Waikato-Tainui supports the intent of the draft New Zealand's Threatened Species Strategy (**TSS**). However, we have identified several issues within the supporting consultation document. These are discussed in more detail in the following submissions.
5. Waikato-Tainui supports and promotes a co-ordinated and collaborative approach to natural resource and environmental management.
6. Waikato-Tainui are recognised as kaitiaki of the environment and view the holistic integrated management of all elements of the environment such as flora and fauna, land, air and water as of utmost importance.
7. Waikato-Tainui have developed several strategic documents that set out our aspirations and provisions relating to natural resource and environmental management. We would therefore seek to ensure that all strategies, plans and policies align with these aspirations and provisions:
  - a. Whakatupuranga Waikato-Tainui 2050 – Strategic Plan
  - b. Tai Tumu, Tai Pari, Tai Ao – Waikato-Tainui Environmental Plan
8. Whakatupuranga 2050 is the strategic plan for the cultural, social and economic advancement of Waikato-Tainui. Its vision is to grow a prosperous, healthy, vibrant, innovative and culturally strong iwi. Its mission is for the iwi to grow, prosper and sustain.
9. Tai Tumu, Tai Pari, Tai Ao, the Waikato-Tainui Environmental Plan is designed to enhance Waikato-Tainui participation in resource and environmental management. The Plan is also intended as a tool to provide clear high-level guidance on Waikato-Tainui objectives and policies with respect to the environment to resource managers, users and activity operators, and those regulating such activities, within the Waikato-Tainui rohe.
10. Waikato-Tainui is available to discuss our submission. We seek direct engagement with the relevant representatives on the matters set out in this submission, in advance of the draft TSS being finalised.

## BACKGROUND

11. In 1987 the Crown enacted the Conservation Act, The Conservation Act was developed to promote the conservation of New Zealand's natural and historic resources. Section 4 of the Act gave effect to the Treaty of Waitangi by setting out that *"This Act shall so be interpreted and administered as to give effect to the principles of the Treaty of Waitangi"*.
12. The draft TSS that has been developed by the Department of Conservation (**DOC**) seeks to provide a more efficient and certain consent process for managing existing maine farms within environmental limits and implement a nationally consistent framework for biosecurity management on all marine farms.

## SPECIFIC WAIKATO-TAINUI SUBMISSIONS

13. Waikato-Tainui's concerns relating to the draft TSS set out in the consultation document relate to the following:
  - a. Giving effect to section 4 of the Conservation Act 1987
  - b. Integrating the Treaty Partnership
  - c. Empowering Maori as Kaitiaki
  - d. Integrating Te Ao Māori and Mātauranga Māori
14. We set out further details on those matters below.

### **Conservation Act 1987**

#### *Giving effect to section 4 of the Conservation Act 1987*

15. The Conservation Act 1987 (**the Act**) includes one of the highest levels of legal requirement for the Crown to deliver on its contractual obligations in respect of the Treaty of Waitangi. Section 4 states *"This Act shall so be interpreted and administered as to give effect to the principles of the Treaty of Waitangi"*. Unfortunately, the Act is largely unclear on how the Department is to this. As section 4 directs, the Act is to be interpreted based on the treaty principles. Therefore, without clear direction within the Act this requires a reliance on a range of other mechanisms found within various settlement provisions, the Department's Standard Operating Procedures and guidance documents such as this strategy. While there have been some progress post Settlement there has not been a significant movement forward for iwi in terms of an authentic partnership through section 4.

### **Treaty Partnership**

#### *Integrating the Treaty partnership*

16. There are constructive opportunities for iwi and hapū to be involved in the on-going conservation and restoration work and these should be clearly provided for in the TSS. Greater clarity and consistency of language within the TSS when describing *'partners'* is also required. Liberally applying the partnership concept to Iwi, other stakeholders, commercial investors and the general public devalues the paramount partnership of iwi have with the Crown as provided for under the Treaty. This Treaty



partnership should be strengthened and better represented throughout the Strategy to reaffirm it as a core element of TSS.

## **Kaitiakitanga**

### *Empowering Iwi as Kaitiaki*

17. The vision driving this strategy references the “*underpinned partnership ethic between government and Māori*”. It connects the proposed actions and outcomes from the strategy with the expected result of iwi being able to fulfil their role as kaitiaki. However, it is unclear if this statement refers to iwi being able to exercise their role as kaitiaki during the Crown's effort to restore these threatened species or once that has been completed. There is clearly a misunderstanding regard the meaning of Kaitiakitanga. As tangata whenua Kaitiakitanga means more than guardianship it is an inherent responsibility to protect our environment.

## **Goal 3**

### *Integrating Te Ao Māori and Mātauranga Māori*

18. The TSS also includes four Goals (to achieve the vision and assess progress). Goal 3 states that the Department will “*Integrate Te Ao Māori (the Māori world view) and Mātauranga Māori (Māori knowledge) into species recovery programmes by 2025.*” This goal aligns with the aspirations of iwi to progress towards a genuine Treaty partnership as envisioned by Section 4. However, the Strategy provides little strategic guidance on how this integration could be achieved. There is no meaningful narrative or explanation offered within the document of how this might be given practical effect in the policy and management work for threatened species. There also no reference to any existing Settlement obligations relating to species, or recognition that a number of iwi are yet to settle with the Crown which may have similar species provisions. By the lack of information on how Goal 3 would be achieved the TSS demonstrates the Department does not have the ability to fulfil their obligations as a Treaty partner and must rely on iwi to fulfil that requirement. Iwi should therefore be resources to participate and provide clear advice about integrating Te Ao Māori and mātauranga Māori in relation to species management. This approach should also include the development of a monitoring framework.

## **CONCLUSION**

19. As noted above, Waikato-Tainui is supports intent of the draft New Zealand's Threatened Species Strategy. However, we note our concerns and would be pleased to discuss this submission with the Department of Conservation.

**DATED**

28 July 2017

**WAIKATO TAINUI TE WHAKAKITENGA O WAIKATO INC**  
By its Environment Manager;



**Address for Services:**

[REDACTED]

C/o Waikato Raupatu River Trust

PO Box 481

Hamilton

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

# New Zealand's Threatened Species Strategy: submissions for consultation

#62

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter or contact person:	[REDACTED]
Organisation name: <i>(if on behalf of an organisation)</i>	The Isaac Conservation and Wildlife Trust
Email:	[REDACTED]
Signature: <i>(we accept a typed signature if no electronic signature)</i>	[REDACTED]

**Submission:**

**You can answer all or some of the questions.**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

*We generally agree but please note our concerns as per below.*

2: Are there additional aspects that you think should be included in the vision?

*Details of how the more ambitious goals will be achieved under the proposed resourcing plans. Acknowledgement of limitations and projections or contingencies for likely but undesirable outcomes.*

3: Do you agree with the characterisation of the value and current state of our native species?

*No comment*

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

*No comment*

5: Are there other tools we could use to help us achieve the vision?

*No comment*

6: Will the proposed goals help us achieve the vision and assess our progress?

*No comment*

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

*No comment*

8: Have we identified the right strategic themes?

Yes

9: Do you agree with our top 10 actions?

*There are a few claims that we are sceptical of in the absence of evidence. This is demonstrated by Action Point 10 “Develop and implement a comprehensive monitoring regime...”. This needs further investigation as comprehensive monitoring*

*techniques can be dramatically different for different species and many of them are impractically expensive by today's standards. A realistic definition of "comprehensive monitoring techniques", an acknowledgement of where the limitations lie and what species will be excluded from this are necessary to satisfy us that this is a useful or realistic action point.*

10: Are there any other actions that should be included, and any actions that should be removed?

*No comment*

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right • **Too few**

**Comments:** *We think the Orange Front Parakeet should be included*

12: Have we identified the right priority species?

*Not all the species have been identified in the list. We feel that the algorithm is flawed in that the social importance component has too strong of an effect on the final rank ( $W$ ). Species that are considered iconic (eg. North Island Brown Kiwi, Kakapo, Tuatara) are already enjoying the benefits of being iconic, in that they have received focused and exceptional attention from DOC to arrest decline and/or ensure survival. We would argue that the boost received by iconic species (by fixing their  $W$  value above 1000) is unnecessarily large, as iconic or socially important species have an innate advantage in competing for conservation resources through simple human bias.*

*Furthermore, we would like to question how the list of notable species was produced. As this holds so much significance in the final ranking weight ( $W$ ) we feel that the criteria for selection to this list should be as transparent as the rest of the algorithm.*

*As far as can be discerned from the threatened species strategy algorithm page on [doc.govt.nz](http://doc.govt.nz) the weighting algorithm does not take conservation status qualifiers (From: NEW ZEALAND THREAT CLASSIFICATION SERIES 19, Conservation status of New Zealand birds, 2016) into account. These qualifiers are very important to the interpretation of the conservation status and criteria. Qualifiers such as EF (Extreme Fluctuations), St (Stable) or DP (Data Poor) are likely to have a big impact on probability of a species' extinction within the next 10 years and as such should be accounted for within the ranking algorithm. To ignore the qualifiers from the NZTC Series is to lose a significant amount of data resolution.*

13: Do you think other species should be prioritised ahead of the ones listed? And why?

*As the main breeding facility for the Orange Fronted Parakeet (OFP) we are very disappointed to see that the OFP is not included in the list of 150 priority threatened and at risk species. This is a species that desperately needs enhancement of conservation efforts to avoid facing an enhanced probability of extinction on the mainland.*

*We understand that the OFP has probably been omitted from this list due to other representatives of the genus Cyanoramphus existing in relative abundance throughout the country, nevertheless we take exception to this omission on grounds of conservation status.*

*The Orange Fronted Parakeet enjoys the miserable designation of Nationally Critical, Criteria: C, Qualifiers: CD (Conservation Dependent), EF (Extreme Fluctuations), RR (Range Restricted). It is very disheartening to see species which are many degrees less endangered taking priority for enhancement of conservation effort. The North Island Brown Kiwi for comparison is designated as: At Risk, Criteria: B (1/1), Qualifiers: CD (Conservation Dependent), PD (Partial Decline), RF (Recruitment Failure). This species which holds a conservation status of objectively much lower risk and far slower rate of decline is set to take precedence over the OFP for enhancement of conservation effort and we believe this is a profound error. Especially when consideration is given to the fact that this iconic and well known species has enjoyed and will continue to enjoy enhanced conservation effort simply due to its official or unofficial social importance.*

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

*No comment*

15: Do you have any further comments regarding the draft Strategy that is not covered above?

*We would like to see some specifics about how the dial back of extra funding from \$28 million to \$7 million per annum will be handled and see some expectations of how this short term boost will put us on good footing to eradicate predators by 2050. This strategy is lacking detail.*

**From:** [REDACTED]  
**Sent:** Friday, 28 July 2017 1:44 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** 1080 submission

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I write to protest the Fallacious Indiscriminate Babrabric poisoning of our forests and all who live in them and the pollution of air land and water with 1080.

One fallacy of 1080 poisoning is the fact that the target species, viz, Possums and Rats DO NOT Eat baby Birds or Eggs. They are falsely blamed for this and villified and persecuted.

So the entire practice is based on this false premise as well as the erroneous concern about Herbivores eating foliage which Moa used to do and whom we need Possums, Deer, Tahr, Chamois, Goats and Boar to replace and thus fertilise the forest.

New Zealand forests are losing soil fertility due to the loss of 6 to 12 million giant Moa.

Rodents live in Forests everywhere else in the world and are scavengers who clean the environment as are Possums.

Everyone has a place in a Dynamic environment. 1080 Rats' and Possums' Diets.

Originally the forests in NZ housed and fed 6 to 12 million browsing Moa, a giant bird, and grazing Kakapo, large parrots, and myriad other birds most of whom have been killed by invading humans.

The Moa and other birds fertilised the soil with their excrement.

Since the demise of the Moa who are now extinct and the Kakapo who are near extinct soil fertility has been declining to the extent that trees are affected eg. Kauri Die-back.

Deer, Tahr, Chamois, Goats, Boar and Possums could replace Moa and other birds by browsing, grazing and foraging in the forest and fertilising the soil thus restoring soil fertility and the health of the forest.

Possums and rodents are scavengers who clean the environment.

Everyone has a place in a dynamic environment.

However deer, Tahr, Chamois, Goats and Possums and rodents are cruelly shot, stabbed, trapped or poisoned with 1080 (or cyanide) to die a slow agonising death over days or over a week.

The indiscriminate dropping of baits poisoned with 1080, Brodifacoum and cyanide since 1953 has not eradicated rats; in fact they are becoming increasingly resistant.

These poisons also kill possums, deer, Tahr, Chamois and Goats who could replace the extinct Moa and the near-extinct Kakapo as grazers to fertilise the soil.

These poisons also kill cattle, sheep, horses, fish, cats, dogs and birds, including the native birds DoC claims to be protecting as well as insects, including bees, and worms.

These poisons are barbarically cruel causing an agonising death over days.

Rat populations plateau and nature can restore the balance if allowed to do so.

The interference in this Process has continued the Demise of Native Birds as well as causing Deforestation due to loss of Soil Fertility.

Government Corruption and Legislation protects the Profit of the Animal Control Producers who make the Baits containing these Poisons.

ExoticoPhobia \_ More Zen, Less Phobia

Human Pests and Plague Humans

Corrupt Government Agencies such as the Department of "Conservation", Animal Control Producers, the Animal "Health" Board and Councils and NGO's such as Royal NZ Forest and Bird Villify, Persecute, Torture and Kill by Poisoning with 1080 ( Sodium Mono Fluoroacetate), Brodifacoum, Warfarin and Cyanide introduced Animals such as Possums, Rats, Deer, Chamois and Tahr.

Repeated Blanket Poisoning from Helicopters and by land Indiscriminately Kills all Animals, Birds, Insects and Worms thus causing Prolonged and Agonising deaths over Days of the Target Species and also Birds including the Native Birds they Fraudulently Claim to be Protecting as well as Cats, Dogs and Fish, insects and Earthworms thus affecting even Soil Fertility and causing Dieback of Native trees.

These Toxins poison Land, waterways and Adjoining Pastoral Farms thus risking Poisoning Cows and Sheep.

NZ Maori Burnt 30-40% of the Original Ancient Forests and Killed 6 -12 Million Moa, Large, Herbivorous Birds who Browsed the understory of the Forests thus preventing Choking of Conifers, who act as Carbon Sinks, and Risk of Fire; Kakapo served a similar role but are now near extinct.

Deer, Chamois and Tahr would,if allowed, fill the Niche left by the Moa and Possums would fill the niche left by Kakapo.

Rat and Possum Diet Studies.

NO to 1080 use in NZ shared [REDACTED] post.

23 October 2016 ·

No sign of any chicks or eggs in the possum diet.... hundreds and hundreds of possums autopsied in all seasons, yet not one trace. If they are such voracious predators then how could this be?  
It is the same with rats in the Sweetapple Nugent 2007 study which autopsied rats and possums. Over 14 years the study ran and only 2 rats showed any evidence of avian remains.  
Are we having the good old possum-merino wool pulled over our eyes and being whipped into a frenzy of non-native hatred by the agencies responsible for using aerial-1080?

[REDACTED]

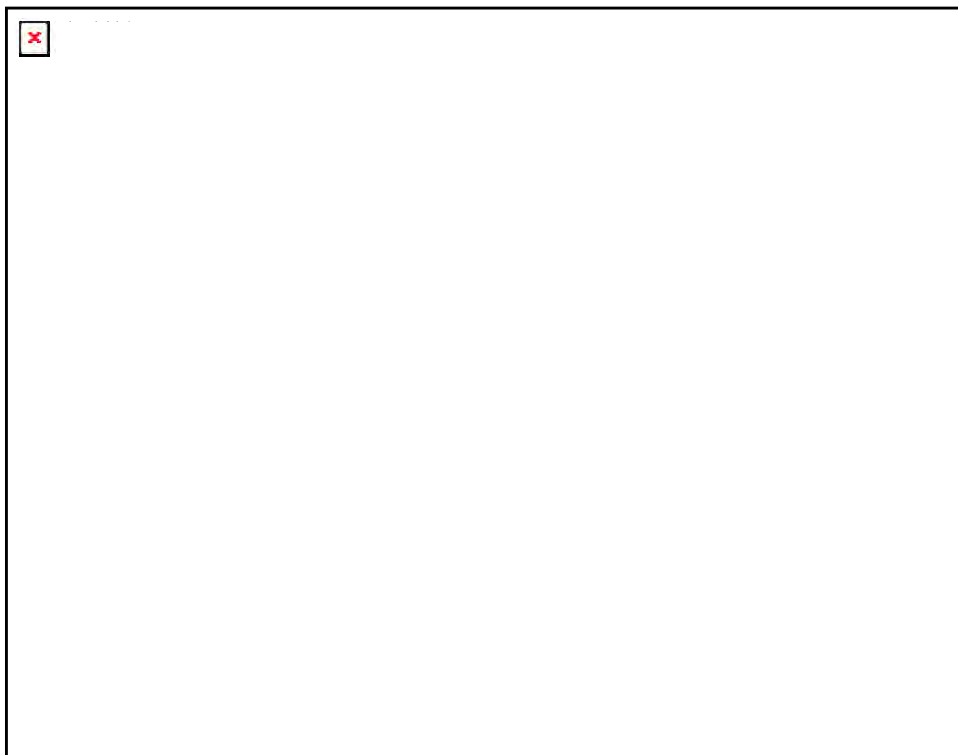


17 October 2016

Impossurable

But surely possums prefer eating chicks and eggs (according to Natureland!)

This table is from a 2004 Landcare study on possum diet. Look carefully, not one trace of an egg or chick, and yes it covered all seasons....)



NO to 1080 use in NZ

20 February 2015

This is the most up to date and in-depth study regarding rat population increases after 1080 drops providing evidence that control of introduced possums may increase ship rat abundance. A podocarp-hardwood forest was assessed using simple interference indices over 14 years (1990-2004) that included two aerial-1080 possum-poisoning operations (1994, 2000). Rat and possum stomach contents were studied and recorded. Seeds, fruit dominated both rat and possum diets. Invertebrates were found in rat stomachs and the apparently important role of invertebrate/insect consumption in ship rat breeding in this study demonstrates that invertebrates provide the nutritional trigger to reproduce. Only two rats were found to have bird remains. The study found that possum control can increase rat numbers as much as five fold and the results are consistent with the hypothesis that increased rat abundance following possum control is a consequence of greater availability or reduced competition for seeds and fruit.

And what does DoC have to say? Surely they cannot totally disregard this study!! The cracks are growing.

<http://newzealandecology.org/nzje/2834.pdf>

NO to 1080 use in NZ

Sweetapple and Nugent: "Diet of ship rats and possums in a podocarp forest."

<http://newzealandecology.org/nzje/2834.pdf>

There are many others.

Rats and Possums are predominantly eating fruit, seeds nuts shoot and sometimes invertebrates; there is very little of evidence of rats with avian remains or egg which shows they are only opportunistic not predatory.

A video set up with fledglings and jam and a studio camera including special lighting does not a predator make.

And rats numbers are knocked back half by winter yet increased 3-5 fold by aerial 1080.

All lives are worth something. Rats have been here at least 1000 years and carbon dating has them at 2500 years ago.

Birds co-exist with them all over the planet. Raptors are the solution. Stoats are the solution. Kill all the rats and stoats prey switch.

1080 poisoning is a losing battle; 1080 is a weapon of mass slaughter that destroys the ecosystem.

All the Animals ostensibly targeted and others including Rats, Stoats, Cats, Deer, Chamois, Tahr, Boar by 1080 have lived in Forests for millions of years and thus have a place in a Dynamic Environment which Evolves like all Life.

It is Hypocrisy to Villify and Persecute Anyone as a Pest when Humans are the Worst Pests who cause more Damage Suffering and Death than all other species combined.

NO to 1080 use in NZ shared [REDACTED] post

19 September 2016

More bizarre behaviour from those charged with protecting our fauna. Is this a 'never mind' moment for some DoC staff? Is it 'pick and choose' your charismatic native birds but not if they are too naughty? It appears as though Genesis 1:26 is being taken too literally.

Next they'll be picking off hawks and falcons for actually being real "predators" - unlike a couple of the mammals they label as such. The possums and rats whose diet (according to studies) is mostly made up of seeds, fruit, shoots, leaves and invertebrates.

We need to have a lighter touch on the environment - and to show some respect.

[REDACTED] to 1080 eyewitness

18 September 2016

Te Anau

My 8 year old son tells me that a DOC lady came to the school recently and was telling the kids how much of a pest the Keas were.... they kill heaps of sheep etc.

They were at the school talking about blue ducks. He said they were shown pictures of keas dead and a video? Yes back in the day - way back this was true but crikey come on!

I worked 4 seasons in the hills guiding. The keas are a bit of a nuisance but I loved them and they're so much fun. They can't keep killing them off.

Are they trying to brainwash the kids young to justify the mega use of 1080 that is wiping them out???

To quote from the open letter to all MPs:

Aerial 1080 kills randomly and inhumanely.(9)

Where there is scientific uncertainty, caution must be exercised under the Hazardous Substances and New Organisms Act 1996 .(11) We think that caution is being ignored by DoC when 1080 is dispersed aerially over forest ecosystems.

Guardianship of taonga, guaranteed under the Treaty of Waitangi Act 1975, has been ignored.

The sentience of animals is recognised by the Animal Welfare Act 1999, but has been denied to animals classed as "pests". (12)

1080 - The Evidence

References:

"The Third Wave - Poisoning the Land"

by W. Benfield:

<http://poppieshavelocknorth.circlesoft.net/p/nz-non-fiction-the-third-wave-poisoning-the-land?barcode=9781872970288>

<http://www.almobooks.co.nz/product/469805-TheThirdWavePoisoningtheLand-9781872970288>

"At War with Nature - Corporate Conservation and the Industry of Extinction"

by W. Benfield

<https://www.amazon.com/War-Nature-Corporate-Conservation-Extinction-ebook/dp/B00T2T9KT2>

DR Peter Scanlon & Dr Sean Weaver - Low-dose 1080 poisoning - Rongoa plants

<https://www.youtube.com/watch?v=CgNnpt8A7Cs&feature=youtu.be>

1080 poison coverups - farmers speak out

[https://www.youtube.com/watch?v=K7vtWj\\_5Utg&feature=youtu.be](https://www.youtube.com/watch?v=K7vtWj_5Utg&feature=youtu.be)

NZ Government Seizes Use of 1080 Poison

<http://tasmaniantimes.com/index.php/article/nz-government-seizes-use-of-1080-poison>

The Horror of 1080 Poison ...

<http://tasmaniantimes.com/index.php/article/the-horror-of-1080-poison->

1080: Chemotherapy or Holocaust for the NZ Ecosystem - See more at:

<http://www.tasmaniantimes.com.au/index.php/article/1080-chemotherapy-or-holocaust-for-the-nz-ecosystem#sthash.XiYzZMCu.dpuf>

<http://www.tasmaniantimes.com.au/index.php/article/1080-chemotherapy-or-holocaust-for-the-nz-ecosystem>

Parrots - DoC Poisons Endangered Kea Parrots

[https://www.youtube.com/watch?v=c\\_s7SLaMxmk&feature=youtu.be](https://www.youtube.com/watch?v=c_s7SLaMxmk&feature=youtu.be)

Poisoning Paradise - Ecocide New Zealand - Festival Version

<https://www.youtube.com/watch?v=yQRuOj96CRs>

False TB Results Show Change is Needed

<http://www.scoop.co.nz/stories/PA1506/S00220/false-tb-results-show-change-is-needed.htm>

<http://www.stop1080poison.com/>

Dogs Poisoned:

<https://www.facebook.com/glen.j.tomlinson/posts/10209604568655816>

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[REDACTED]

[REDACTED]

# New Zealand's Threatened Species Strategy: submissions for consultation

#64

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

[REDACTED]

Organisation name:  
(if on behalf of an organisation)

Central Hawkes Bay Forest and Bird

Email:

[REDACTED]

Signature:

(we accept a typed signature if  
no electronic signature)

[REDACTED]

**The Central Hawkes Bay Branch of Forest and Bird endorses the Forest and Bird Head Office submission.**



**Submission:**

**You can answer all or some of the questions.**

**1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

*No – This vision lacks ambition when it comes to protecting our threatened and at risk native species. It needs to honour New Zealand's international commitments;*

*To restore viable populations of all our threatened and at risk species across their natural range and maintain their genetic biodiversity.*

*This could be encapsulated by a vision based on that recommended by the Parliamentary Commissioner for the Environment's recent Report on the state of our native birds.*

*“The restoration of abundant, resilient and diverse species and habitats across their natural range.”*

*To achieve this, the Strategy's vision needs to be much more ambitious than just aiming to safeguard 20% of our threatened species by 2030. Like Predator Free New Zealand it needs to aim high and look to safeguard all our threatened species by setting clear goals for significant increases in the number of threatened species that will be actively managed for their restoration; i.e.:*

- **All** threatened and at risk species will be protected, not just 20% of them, and
- **All** threatened and at risk species that are conservation dependent will be under intensive management setting them on a path to recovery.

*The vision for Predator Free NZ by 2050 – is supported.. This needs to be expanded to include the other key introduced predators, especially mice, ferrets, weasels and feral cats.*

*“Battle for our Birds” is supported but needs to be expanded so that all of the public conservation land needing predator control is under regular sustained predator control. This would only cost around \$50 million a year (based on roughly 7million ha receiving control once every 3 years with an average cost of \$7 per ha).*

*Until we have eradicated all introduced predators we need to make sure that our threatened species survive and no more species become threatened. To do this we will also need comprehensive, landscape – scale, predator control on land outside of the conservation estate.*

*The “War on Weeds” also needs to be expanded from the dirty dozen as this is less than 4% of the 350 weeds which currently threaten nature. Weeds such as lupin, broom, poplar and gorse are urgently in need of control in some habitats where there are many threatened species such as braided river beds and lowland dryland sites.*

## 2. Are there additional aspects that you think should be included in the vision?

*The vision should address:*

- *the need to halt the loss of habitats that support threatened species*
- *Increased emphasis on improving our knowledge of the threats to, and conservation status of, species.*
- *Actions for threatened marine species.*

*The vision is focused on land based threatened species and actions to assist them, yet there are large numbers of sea birds threatened with extinction as well as dolphins, whales, sealions, marine fish and invertebrates.*

*The vision and actions of the Strategy need to incorporate an all-of-government approach to protecting threatened and at risk native species. The actions (or lack of action) of many government agencies have significant impacts on our threatened species. All government agencies should have a responsibility under the Strategy to ensure that their policies and actions support the restoration of threatened and at risk species.*

## 3. Do you agree with the characterisation of the value and current state of our native species?

*Yes Agree with the value of our biodiversity.*

*The Trouble in Paradise section of the strategy needs to recognise the impact of the commercial harvest of threatened species, such as whitebait species and Long finned eels, and the continued clearance of habitats of threatened species for commercial development such as farming intensification, urban expansion and infrastructure such as motorways.*

*The state of our species section needs to be more specific so that it is clear that for example what percentage of our birds, or reptiles, are threatened, and what the trends are for each group of species.*

## 4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

*The Strategy needs to require that all critically threatened species that would benefit from detailed management plans also have dedicated recovery groups that oversee the production and implementation of those plans.*

*The Strategy places too much emphasis on the need to prioritise the work between threatened species. This emphasis appears to be driven by the lack of resources, rather than conservation need. All threatened and conservation dependent species need to be managed for protection and there needs to be flexibility to be able to work on species that may not have been prioritised, but where an opportunity or a necessity arises.*

*Captive management should only ever be a last resort tool, as the priority for threatened species must be conservation in situ.*

*While Fenced sanctuaries serve a useful purpose, they should not be prioritised over conservation of threatened species in situ.*

*As the Parliamentary Commissioner for the Environment's recent report notes, translocations are expensive and risky and should be evaluated against the overall benefit of the species and against the benefit of using the same resources to control predators, or to provide other assistance in the in situ restoration of threatened species.*

*The development of native threatened plant and habitat protection legislation is supported..*

*Support the adoption of a comprehensive National Policy Statement on Indigenous Biodiversity under the RMA.*

*Support greater use of legislation, regulation and policies to ensure that human actions do not further threaten species, for example zero bycatch of threatened species in the fishing industry, no clearance of threatened species habitats.*

*Development of a National Policy Statement on indigenous biodiversity is supported provided it sets bottom lines for biodiversity protection on private land, that will achieve the vision and the goals needed to protect and enhance all our Threatened and At Risk native species and prevent others becoming threatened.*

## **5. Are there other tools we could use to help us achieve the vision?**

*The best possible tool is to ensure that the Department of Conservation is adequately funded to undertake all the steps necessary to restore all species at risk of extinction and to prevent others from becoming threatened.*

*The government needs to also adequately resource science to identify the threats and agents of decline and develop management prescriptions*

*Tools and resources are needed to ensure the monitoring and enforcement of existing legislation, policies and regulations at the central and regional and local government levels.*

*Utilise the Crown's tenure review process to secure high country threatened species habitats and ecosystems in Crown ownership and control.*

*Greater use of DOC's advocacy functions under resource management and other legislation to halt the decline of our biodiversity and enhance threatened species and their habitats.*

*Regulations are needed to require appropriate bycatch mitigation techniques, and transition to modern, low impact, fishing techniques.*



*The war on weeds needs to be expanded from just 13 of the 350 weeds known to be harmful to nature.*

## **6. Will the proposed goals help us achieve the vision and assess our progress?**

*The proposed goals need to be considerably more ambitious.*

*There are no goals to achieve enhancing all of our threatened and at risk species, or increasing knowledge about the many data deficient species so that no species are data deficient.*

*There is no goal setting out how progress will be assessed and publicly reported.*

*Goal 4 fails to set a target for assessing data deficient species*

## **7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

Amend the goals to include:

- *Enhance the populations of more than 50% of our threatened species so that they are on the road to recovery by 2025,*
- *Manage all threatened species requiring conservation intervention for protection so that no species should become more threatened*
- *All threatened and conservation dependent species should be actively managed for recovery by 2030.*
- *Reduce by kill of threatened species to ensure recovery to non threatened status*
- *Select 230 data deficient species every year so that by 2030 there are no data deficient species.*

## **8. Have we identified the right strategic themes?**

The following additional themes should be included:

- *Uniting all Government Agencies in an “all of government” response to threatened and at risk species to ensure all native species thrive.*
- *Maintaining genetic diversity and creating resilience*

## **9. Do you agree with our top 10 actions? -**

*Yes with additions and amendments, as set out below.*

**10 Are there any other actions that should be included, and any actions that should be removed?**

*In addition to achieving the Predator Free 2025 goals and the Battle for our Birds response to maasting events,*

*Increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control.*

*Develop a portfolio of priority areas for sustained and effective predator control beyond public conservation lands.*

*Amend Action 7 to; Develop and publish a portfolio of priority areas for threatened species protection on private land.*

*Amend Action 8 to select 1000 rather than 500 of the 3000 data deficient species for assessment.*

*Amend Action 9 to ensure that national recovery planning systems are not only fit for purpose but are also timely and implemented to achieve threatened species goals.*

*Add to Action 10 the development of a system for monitoring and regular public reporting on progress towards the goals.*

*Introduce regulations to achieve zero bycatch of threatened species in fisheries.*

*Expand the War on Weeds to include lupins, broom and willow on river beds and their margins*

*Add an action to identify and take opportunities to preferably purchase, or covenant habitats of threatened species.*

**11. Have we identified the right number of priority species?**

(Circle or highlight one)      • Too many      • About right

• Too few

**Comments:**

*The number of threatened species identified needs to be driven by what is actually required to safe guard our threatened species and ensure that their populations are resilient and thriving rather than fitting the prioritisation to the current lack funding.*

**12. Have we identified the right priority species? No**

*All the threatened species and those that are at risk and conservation dependent should be prioritised for enhancement by 2030*

**13. Do you think other species should be prioritised ahead of the ones listed?**

**And why?**

*Prioritisation should be dependent upon threat status, with account taken of the imminence of threats and be less influenced by the cost of management.*

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

*The overall framework is seriously lacking in ambition.*

*The vision, and consequent framework only proposes to increase the populations of 150 out of 800 threatened species at risk of extinction, and manage 600 out of a further 2,200 species at risk of decline. The vast majority of threatened and at risk populations which need help now are not covered by the Strategy's proposals for action.*

*The strategy focuses on terrestrial species, relying heavily on Predator Free NZ, Battle for our Birds and the limited War on weeds. There is a disappointing lack of focus on out shore and seabirds which are also facing significant threats or marine and freshwater species generally.*

*It fails to commit all government agencies to do their bit to meet the strategy's goals, especially for marine species, or commit the government to ensure that all of the public conservation lands needing predator control are under regular sustained predator control, and that there are effective policies and actions to protect threatened species on private land.*

# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

[REDACTED]

Organisation name:  
(if on behalf of an organisation)

Landcare Research

Email:

[REDACTED]

Signature:

(we accept a typed signature if  
no electronic signature)

[REDACTED]

## Submission:

### You can answer all or some of the questions.

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025

The general direction is good – clear outcomes, but it is less clear about how these may be achieved.

The vision statement appears to be encapsulated in the single sentence “...safeguard our vulnerable threatened species.” The vision statements (Vision, p 4) would be clearer to the reader by removal of the extraneous information from the Vision text that is covered elsewhere in the Strategy.

2: Are there additional aspects that you think should be included in the vision?

It is not at all clear how species / sites / activities will be prioritised. Given that resources will inevitably be limited, how will you prioritise delivery on all of this? How will DOC know if they are winning or need to change tack? It is the details that are important here. The PCE's recent report on birds had some well-considered recommendations that should also be included, or at least referenced. The PCE raised questions about how we are understanding/managing genetic diversity in birds and said that there is strong disagreement about this. Surely this is an key underpinning research area requiring urgent attention for the most threatened of all our species?

3: Do you agree with the characterisation of the value and current state of our native species?

The characterisation does not cover many components of our biota – most notably bryophytes and fungi are omitted.

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

Partially, see below.

5: Are there other tools we could use to help us achieve the vision?

We would like to highlight three points:

- A notable omission in the tools is the scientific research that underpins the work required. This should include fundamental research that provide the basic knowledge on our biota (supporting Goal 4) through to more applied

research aiming to provide new tools and techniques to address all of the threats that have been identified.

- The “Top 10 Actions” (page 40), contain very little in the way of actually managing threatened species beyond mitigating risk to them from predators / improving biosecurity. Better understanding of the biology and recovery of threatened species is mentioned throughout the document, but it doesn't appear to be a key action. We need to be careful to avoid the idea that if we just remove the pests from the environment everything will be fine – species recovery will be considerably more complex than this.
- No mention is made of the need for improved spatial and "proof of eradication" modelling that will be needed to underpin large-scale management of pests or their eradication. There is too much focus on tools rather than on a need to better understand the strategic and social issues. Rock wren and kea deserve specific mention because of the particular challenges they pose with being in an alpine environment (i.e. these areas can't be fenced). Also there is a fuzziness about predator free (i.e. eradication) and doing sustained control to achieve outcomes and this ongoing lack of clarity needs to be remedied.

6: Will the proposed goals help us achieve the vision and assess our progress?

Although it is desirable that DOC will have the resources to manage more of New Zealand's threatened species, shouldn't the vision be that New Zealand will have less threatened species threatened and therefore fewer species to protect? The goal to increase the number of protected species is not outcome focused.

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

8: Have we identified the right strategic themes?

9: Do you agree with our top 10 actions?

- Action 1 and 2 – Action 2 appears to be an expansion of the work required to support Action 1. Action 1 and 2 should be combined into a single action
- A range of threats are identified by the Strategy (page 10) including from introduced predators, herbivores, weeds, land use change, illegal activities and industrialisation, however only one of these threats (introduced predators) is explicitly addressed in the action plan. Given the ecosystem scale impact of herbivores and weeds actions addressing these threats in the Action list would be appropriate.

- Action 3. Seed banking –the Strategy (page 22) acknowledges that there is insufficient information on whether seed banking is appropriate method for storage for all components of our indigenous flora, and that additional research is required to understand their storage, propagation and ecology to support restoration. However, the requirement for research in this area is not reflected in the action list. The Strategy also acknowledges that seed banking “is not a panacea” (p 22), given these acknowledged uncertainties, and the resource intensive nature of seed banking, it is perhaps surprising that it features so highly in the list of actions.
  
- Action 8. Data Deficient species. This Action focuses on selecting 500 of the data deficient species to focus research on further scientific work (page 40). We applaud this emphasis on further systematics research and the role that National Taxonomic Collections in New Zealand can play. However, the research focus of Action 8 needs to be broadened beyond taxa in the data deficient category to encompass other vulnerable species. Even the list of 150 taxa includes a number of “tag name” entities that have not been taxonomically examined as well as other species which still require basic research. For example:
  - a. *Kiwaia* ‘Cloudy Bay’. There are three completely flightless species in this genus - remarkable as they are on the mainland of NZ, while most completely flightless Lepidoptera occur in the Subantarctic. All three are threatened, and two are unnamed. A revision of these species would enable description of the unnamed species in this group, including K. ‘Coudy Bay’.
  - b. *Stathmopoda campylocha*: the life history is unknown, but it is associated with *Olearia hectorii*. Stathmopodids are elusive moths and have not been taxonomically revised. This particular species is often confused with others in collections, although it is recognisable to an expert. While we agree this species should be consider a priority, given the lack of knowledge combined with the difficulty in identification, it will be difficult for a non-specialists to monitor this moth.
  - c. *Cryptodacne rangiauria* is a Chatham's (Pitt) Island species with very little data. It is possible this species may occur on mainland Chatham Island once the appropriate ecological associates are examined.
    - *Pseudhelops antipodensis* is endemic to the Antipodes, and is a microhabitat specialist (possibly on lichens). It is probably doing well but is under collected because no one is specifically looking for this species.

Population demographics / genetics / viability is an omission, as is habitat quality to some extent. Pests appear to refer to mammalian predators, whereas in some areas wasps are likely to be a major threat. Likewise, mice.

10: Are there any other actions that should be included, and any actions that should be removed?

Action 3 could be removed from the top 10 list (although not dropped from a more complete list), and Action 2 could be combined with Action 1. These should be replaced with two new actions addressing: 1) the impact of weeds and 2) the impact of herbivores.

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right • Too few

### Comments:

This is questionable, albeit it will always be a difficult task. The inclusion of tag names is always controversial, and it is good to see the description of “What do we mean by species” on pg 13. The definition however (biological species concept) is a very naïve approach and one that isn’t compatible with the priority species list – a large proportion of the named taxa wouldn’t meet the criterion for species if this were applied. While we understand this is aimed at a non-specialist audience, the inclusion of this definition is likely to not sit well with a specialist or even keen amateur audience- probably including key people you would want to be engaged. For example, know that the majority of the *Lepidium spp* named readily hybridise.

Phylogenetic distinctiveness as a criterion for listing? Again, are six species of *Lepidium* that are very closely related phylogenetically necessary for inclusion? Also some taxa that are basically only surviving in cultivation, and have been in this state for the last few years (*Pennantia baylissiana*, *Clianthus puniceus*, *Lepidium banksii* – in the natural environment for the latter admittedly) worthy of inclusion over species that are still found in relict populations? Are species in captivity / cultivation weighted more or less than those that aren’t? If so, why? Given the focus is on predator and threat control as far as the actions are outlined, why such a focus on managed taxa? Why is *Olearia adenocarpa* included but not *Olearia gardneri*? If anything I would suspect the latter is the more critical of the two?

This will always be the most controversial part of any species recovery plan, so any improvement to clarity around this will be helpful.

It is also worth noting that the list purports to “represent the diversity of species the DOC works on (plants, bats, beetles, etc)” (p. 31) however it does not include the full diversity of our biota – most notably is lacks any representation from four major plant groups (ferns, mosses, hepatics and hornworts) as well as lichens and fungi. Despite the additional material, the description of how the 150 species were prioritised is not clear to the reader, therefore it’s hard to judge the scientific basis.



12: Have we identified the right priority species?

See above

13: Do you think other species should be prioritised ahead of the ones listed? And why?

The list does not fully encompass the full diversity of the New Zealand biota. There are potentially species in those groups that should be included in the list. There are certainly a small number of mosses that are highly distinct systematically, well-documented in New Zealand, endemic, and nationally critical and thus merit inclusion in these lists. An example is *Epipterygium opararensense* which is highly likely to be negatively impacted by recent proposals to expand/commercialise tourist facilities in the Oparara Valley. In addition two species of fungi (and soon a third) currently have IUCN red list status and thus a high international profile. *Boletopsis nothofagi* for example is the only representative of the genus in the southern hemisphere and other members of the genus are on threat lists in the northern hemisphere. It is a mycorrhizal fungus, and as such one of many fungi critically essential for ecosystem function in beech forests and the known sites are under pressure.

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

15: Do you have any further comments regarding the draft Strategy that is not covered above?

Page 31 – The Spotlight on kakabeak. It states that there is now more genetic variation in cultivation than in the wild – this is unlikely to be correct. This was studied in 2008 (and again more recently – unpubl data) and showed that the opposite was indeed the case.

Song, J., J. Murdoch, S. E. Gardiner, A. Young, P. E. Jameson, and J. Clemens. 2008. Molecular markers and a sequence deletion in intron 2 of the putative partial homologue of *LEAFY* reveal geographical structure to genetic diversity in the acutely threatened legume genus *Clianthus*. *Biological Conservation* 141: 2041–2053.



# Federated Farmers of New Zealand

## Submission on New Zealand's Threatened Species Strategy

28 July 2017



To: DEPARTMENT OF CONSERVATION  
From: FEDERATED FARMERS OF NEW ZEALAND  
Submission on: NEW ZEALAND'S THREATENED SPECIES STRATEGY  
Date: 28 July 2017  
Contact: [REDACTED]  
Federated Farmers of New Zealand  
PO Box 422  
New Plymouth 4340  
[REDACTED]  
[REDACTED]

## 1. SUMMARY

- Federated Farmers welcomes the opportunity to comment on the draft Threatened Species Strategy.
- We recommend that appropriate engagement and partnership with communities (including landowners) is a core plank in the Strategy.
- We support the Strategy's focus on predator control to protect threatened species, along with recognition of weeds as a key risk to our native plants.
- We support the use of planning and prioritisation, underpinned by the data collection and monitoring necessary to inform good management decisions.
- We support the Strategy's purpose and vision, particularly the emphasis on all New Zealanders having a part to play and reference to the ethic of partnership.
- We support strategic Themes 1-3 and 5.
- We outline reservations on Theme 4, around landowner engagement and avoiding duplication of effort. We suggest supporting some existing and successful initiatives to implement this theme.
- We have no specific comments to make on Goals 1-3 and support Goal 4 (around research to plug knowledge gaps and using a science-based approach to optimise the selection of sites for management).
- We support Actions 1, 2 and 4 on biosecurity, investment in improving tools / technologies for predator control and implementing 'Predator Free 2050'.
- We strongly support Actions 3, 7 and 8, as the type of basic data collection that we urgently need for effective management.
- We provide comments on Actions 5 and 6, in relation to regulatory reform and the protection of freshwater biodiversity.
- We support Actions 9 and 10, about ensuring that national recovery planning processes are fit-for-purpose and developing a comprehensive monitoring regime to support species management.
- We recommend further strategic analysis, in order to get a better grip on spatial patterns and priorities for action.

## 2. INTRODUCTION

Federated Farmers welcomes the opportunity to comment on the draft New Zealand's Threatened Species Strategy.

The following comments are representative of member views and knowledge of the management of natural resources. It is important that it is not viewed as a single submission, but rather as a collective one that represents the opinions and experiences of our members.

## 3. GENERAL COMMENTS

### *Partnering with landowners*

Pastoral farmers manage 41% of New Zealand's land mass (primary producers together manage 53%, according to 2012 figures), while 30% of the country is in the Crown conservation estate. Landowners are key stakeholders in biodiversity management and conservation, not only because of the sheer scale of land under their management, but – as the Strategy identifies - because some threatened species are found only on private land. Good engagement with landowners and especially the primary sector will therefore be a determining factor in the success (or otherwise) of initiatives supporting conservation of New Zealand's threatened species.

We believe there is significant appetite in the farming community to do more and better in the area of biodiversity conservation, as witnessed by such things as the current oversubscription of QEII covenants.

The key, we believe, will be working at increasingly large scale, moving from isolated sanctuaries to larger initiatives linking across the landscape. It is partnerships which will make a difference - partnerships with farmers, communities, private and public sectors. This is already happening, as groups of landowners co-ordinate predator control actions for maximum impact or neighbouring farmers string together individual covenants to create wildlife corridors. However, greater support for these efforts is needed and this Strategy could contribute in this area.

We are therefore encouraged at the inclusion of the idea of partnerships throughout the draft Strategy. In our experience, a good process of landowner engagement is critical to the success of conservation initiatives. The reverse is also true, with a poor process damaging relationships which can take years (often decades) to undo and undermine the conservation outcomes sought.

- We recommend that appropriate engagement and partnership with communities (including landowners) is a core plank in the Strategy.

### *Predators and weeds*

Farmers spend a lot of time controlling pests and weeds on their land. They have planted thousands of kilometres of waterways and are responsible for the bulk of the 180,000ha now in conservation covenants; they know that control of predators like stoats, rats and feral cats is an ongoing battle, not to mention possums, rabbits and weeds. Introduced predators and pests are the main threats that we see to indigenous biodiversity on farm.

The Federation therefore strongly endorses the emphasis on predators in the Strategy, expressed in statements such as 'If there is a single thing we can do for our threatened species, it is to eliminate the main mammalian predators – rats, stoats and possums' (p.2). We note that this also tallies with the Parliamentary Commissioner for the Environment's recent evaluation of predators as the most pressing issue facing our birds<sup>1</sup>. We also note that one third of our plant species are threatened by weeds (p.11).

- We support the Strategy's focus on predator control to protect threatened species, along with recognition of weeds as a key risk to our native plants.

### ***Prioritisation and basic data***

Given limited resources, Federated Farmers believes our best shot at making gains quickly is intelligent planning and prioritisation. Basic data are also required to gain a clear understanding of threatened species / ecosystems and to correctly describe any issues that need addressing. Basic data are also required to monitor progress and assess the success (or lack of it) of any actions taken.

The appropriate collection, maintenance and analysis of good long-term data sets are therefore absolutely essential to good environmental management. We agree that 'conservation, like any other investment, needs to be about smart targeting and maximising the benefit from scarce resources' (p.3). We therefore support the thread in the Strategy concerning the need for prioritisation and the collection of the necessary scientific knowledge to support management decisions and address any gaps.

- We support the use of planning and prioritisation, underpinned by the data collection and monitoring necessary to inform good management decisions.

## **4. SPECIFIC COMMENTS**

We note and support the idea that the Strategy help implement 'Predator Free 2050' (p.3).

We support the Strategy's purpose and vision (p.4), particularly the emphasis on all New Zealanders having a part to play and the ethic of partnership (in this case between government and Maori, but we would extend that across the community, an idea that is expressed later in the Strategy document).

### ***The five strategic themes***

We support the first theme ('Uniting against invaders on a landscape scale') and agree with the identified need to manage invasive pests more effectively over larger areas and improve methods of controlling predators, including by collaboration between DOC and the private sector on things like new pest control technology (p.32).

The second theme ('Managing ecosystems at scale to protect species') is also supported, for reasons outlined on page 32 of the Strategy.

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<sup>1</sup> Taonga of an Island Nation: Saving our Native Birds. PCE (2017).  
*Federated Farmers submission on 'New Zealand's Threatened Species Strategy'*

We strongly support the third theme ('Building our science and knowledge base', p.35), particularly the reference to seeking science-based solutions to dealing with threats and improving our knowledge base. We recommend integration of this work stream with the Conservation & Environment Science Roadmap and the Biological Heritage National Science Challenge.

We have some reservations about the fourth theme ('Focusing beyond public conservation land').

Firstly, we understand that some threatened species are found outside of public conservation land and that some ecosystems are under-represented in public conservation areas. We strongly agree that some species need active management to survive; this is something many of our members know from personal experience of biodiversity management. We also do not dispute that DOC has a role to play on private land. It is how this role will be realised that gives us cause for concern.

We have already highlighted how critical community engagement and partnerships are; this is particularly important when you are working with private landowners to manage species on their property. In our experience, engagement must be well-resourced and long-term to be effective, as relationships with landowners take time to build and maintain. There is also a specific skill set required of people involved with such work.

We have already commented on the damage that can be caused, to both relationships and conservation outcomes, when the process of landowner engagement is poor. As DOC is no doubt aware from their existing work in this area, a landowner who feels well supported and empowered to take care of biodiversity on their land is the single greatest protection for any resident threatened species. The landowner is on site most of the time and so available for day-to-day management tasks (such as pest trapping) as no one else could be. S/he often spends significant time and money on conservation work on their property. An engaged landowner also becomes an advocate in their community for conservation.

Ensuring a good process is therefore the main concern for us, so that the experience is a positive one for landowners and meets goals for protection of threatened species on private land. The Federation may be in a good position to assist DOC with the implementation of the Strategy in this regard.

This brings us to a further issue, the potential risk of duplication with organisations such as Regional Councils.

We are encouraged by references to co-operation and avoidance of duplication in the Strategy. We would strongly recommend that a close relationship with local government be a priority in the implementation of this theme. Regional Councils often have an established and well-staffed programme for landowner engagement. It would make sense to take advantage of these existing relationships, in implementing this strategic theme. Farmers also prefer to engage with one rather than multiple agencies on biodiversity (whoever that may be in a particular region); the power of a familiar, friendly face can hardly be over-estimated when it comes to maintaining a productive relationship with landowners.

As already mentioned, there is so much demand for QEII covenants that the programme is over-subscribed. Implementation of the theme 'Focusing beyond public conservation land' could include working with QEII to secure additional funding for processing of covenants. If necessary, this extra money could be tagged to ecosystem types that have been identified as high priority by DOC, thereby helping to implement DOC's targets for threatened species, using a mechanism that

provides a high level of legal protection in perpetuity and has proved popular with landowners for 40 years.

The statement that 'under current legislation, many threatened species have no legal protection on private land' (p.39) would appear to discount regulation under the Resource Management Act. We agree that the RMA can only do so much; we would argue that this is true of all regulation, which is why engaging with the landowner is usually an essential part of the solution. Federated Farmers is also involved with the Biodiversity Collaborative Group to develop a National Policy Statement for Biodiversity and associated complimentary measures.

We strongly support the fifth strategic theme ('Working together in partnerships', p.39). We agree that government agencies cannot achieve biodiversity goals alone and that we need to find new ways to engage people, encourage co-operation, avoid duplication and generally connect the dots. Given DOC has limited resources and its core role remains the management of public conservation land, supporting the work of other groups makes sense, particularly for conservation work on private land.

We find that the regional level is often the best for co-ordination of management interventions, for a variety of reasons. For example, the supporting data on biodiversity appears to be best at this level (certainly compared with the often patchy data available at national level). Communities of interest are also focussed at the regional level, as is local government.

This would suggest to us that taking part in regional biodiversity restoration plans (such as Hawkes Bay's 'Cape to City' and Taranaki's 'Wild for Taranaki') is a good option for implementation of this theme. DOC is already a key player in these initiatives. We believe they are a good model, avoiding duplication and aiding co-ordination of action, to produce more effective and efficient outcomes. Regional restoration plans also provide a unified local 'brand' that all partners can work within, depending on their interests and resources.

### ***The four goals***

We have no specific comments to make on Goals 1-3 (relating to managing greater numbers of species and enhancing populations, integrating Te Ao Maori into species recovery programmes, p.5).

We support the fourth goal ('Support research, particularly through the National Science Challenges, that helps us to better understand data deficient species'). We appreciate that you cannot make management decisions if you 'don't know enough about some species' (p.12). We support the science-based approach to optimise the selection of sites for management (p.20).

We note reference to 'limited powers in legislation to protect biodiversity on private land without the owner's agreement, which can be problematic if urgent action is needed' (p.25). We understand the sentiment, but the rights and concerns of landowners are still to be respected. This issue only highlights to us the value of engagement, education and partnership action.

### ***The top 10 actions***

We support most of the 'top 10 actions' (p.40), making some specific comments below.

We support Actions 1, 2 and 4 on biosecurity, investment in improving tools / technologies for predator control and implementing 'Predator Free 2050'.



We strongly support Action 3 (Identify a priority list of threatened and at risk plant species, and ensure that their seeds are held in a recognised seed storage facility by 2025) and Action 7 (Identify and publish threatened species 'hotspots' both on and off public conservation land to identify the key areas and threatened species for potential protection). This is the type of basic data collection that we urgently need for effective management. For similar reasons, we support Action 8 (Select 500 of the data deficient species to focus researchers on further work).

In relation to Action 5 (Progress key regulatory reforms, including new marine protection legislation and the NPS for biodiversity), we have already commented that the Federation is part of the team developing the NPS.

In regards to Action 6 (Implement freshwater reforms, particularly setting and implementing environmental limits; and continue support for freshwater habitat restoration), we support the aim of supporting habitat restoration. We suggest that implementing the current freshwater reforms is only part of the puzzle, when looking to conserve freshwater biodiversity. There are other issues, including the thorny problem of managing whitebait and eel / tuna fisheries, when these species are already at risk. Then there is the issue of introduced predator fish (including trout and salmon) which kill threatened native species. We recognise that these are sensitive subjects for many and complicated by overlapping legislation (e.g. Wildlife Act 1953, Freshwater Fisheries Regulation 1983). However, if we are serious about protecting our threatened native fish species, New Zealand will need to have these difficult conversations, sooner rather than later.

We support Action 9 (Ensure that national recovery planning systems and processes are fit for purpose, efficient and integrate matuaranga Maori). We also support Action 10 (Develop and implement a comprehensive monitoring regime that can be used by all those involved in species management).

## 5. CONCLUSION

The Strategy is a good starting point. What we are missing is some further strategic analysis applied to the 'to do' list, in order to get a better grip on spatial patterns and priorities for work. We understand that an implementation plan needs to be developed for the Strategy and that some of the data that would support this analysis may be missing (which work such as Actions 3 and 7 will help address).

The PCE's report<sup>2</sup> on birds, which highlighted some priority places (with the reasoning behind them), is a good example of what we would like to see. Noting that the Strategy discusses a shift in focus from species to ecosystems conservation, we recommend that DOC map where the priority ecosystems are located and/or where each of most threatened species of frogs, lizards, plants, birds etc are located. This would help communicate where work should first be targeted; a simple example is the strong overlap between threatened plant species and rare ecosystems. Using modern GIS technology to map the core distributions of priority species would help stakeholders to understand and implement the Strategy, for example.

We hope that our comments will prove useful in developing the Strategy and look forward to being part of its implementation in the future.

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<sup>2</sup> Taonga of an Island Nation: Saving our Native Birds. PCE (2017).  
*Federated Farmers submission on 'New Zealand's Threatened Species Strategy'*

## **6. ABOUT FEDERATED FARMERS**

Federated Farmers of New Zealand is a primary sector organisation that represents farming and other rural businesses. The Federation aims to add value to its members' farming business. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

~ END ~

**From:** [REDACTED]  
**Sent:** Friday, 28 July 2017 5:38 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Name: [REDACTED]  
 Organisation:  
 Email: [REDACTED]

q1: No - its too limited. Only concentrates on some species - we need to look at all our threatened and at risk species - or it will be too late for some of these species to be returned to viable populations.

Concentrating on safeguarding 20% of our threatened species by 2030 ignores the fact that some of the other species may be more at risk. More science - properly funded- is required to ascertain the risks and protect these other species.

Agree with goal of predator free 2050 but feel it will need much more government funding. Also agree with battle for the birds - but this needs expanding - we need landscape -scale predator control over more public conservation land. War on Weeds is also a worthy goal, but again too limited.

q2: Increased knowledge on threats to our native species and ways to overcome this.

Habitat loss should be examined eg pakihi landscape often considered by locals to be just bog...wetlands...

More focus on marine environment

q3: The value of our biodiversity cannot be overstated.

However we risk losing much of that biodiversity - partly due to commercial harvest, habitat clearance and use of public conservation land for extractive industries. More information as to whether or not certain species are declining would be useful.

q4: Ideally all species conservation should take place in situ - which means there needs to be large scale predator control, and control on use of habitats for any other purpose.

Private land use also needs to be considered - National Policy Statement on indigenous biodiversity should set standards for what is allowed on private land

q5: DOC needs to be properly funded so it can do the required research and perform actions to reverse the decline and then restore viable populations of our native species, throughout NZ. Crown's tenure review process should ensure high country is adequately protected to ensure the survival of native species.

DOC needs to become (as it once was) an advocate for nature - it appears to have dropped this role, and often does not submit to important resource consent decisions through the RMA process.

More focus on marine environment to ensure less destruction of marine species as bycatch, or as a result of fishing technique.

q6: Goals needs to be expanded to encompass more species.

How will progress be reported to the public?

q7: Need to ensure that no species is becoming more threatened and that at least 50% of currently threatened species are on the road to recovery. Each year more species should be added to the list being "managed" to recovery, so that vast majority of species are recovering.

q8: This strategy needs to be driven from an "all of government" perspective so it gets more support. Agencies such as MPI, Dept of Environment, NZTA, Biosecurity, Crown Minerals all need to buy into this strategy.

q9: Yes but they need to be elaborated upon.

q10: Increased landscape-scale protection from predators and weeds, at least 1000 species for researchers to work on, identify priority areas on private land and work with landowners to conserve these areas, implement public reporting on progress.

q11: toofew

q11comments: Need to get more funding so that more species can be "saved" - current lack of government funding for DOC implies that government does not take this seriously.

q12: All the threatened and at risk species need to be prioritised as well as ensuring the populations of other native species are not declining.

q13: Apart from the fact that I think all species should be prioritised, the answer to this needs to be driven by science.

q14: It needs to be expanded - there are too many species which will not be covered by this strategy and although some of them will benefit from some of the actions in this plan, others will continue to decline. The focus also needs to be broadened from mainly terrestrial habitats to the coastal and marine habitats.

q15: Would like to see this strategy strengthened and adopted by a cross-party all-of-government approach. It needs to be fully funded and promulgated in order to save our threatened species.

**From:** [REDACTED]  
**Sent:** Friday, 28 July 2017 7:18 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
 Organisation:

Email: [REDACTED]

q1: No, I need to clearly see that doc have acknowledged studies that show that the predator idea is not supported. 26 possums stomach contents analyzed, no birds or eggs.  
 q2: The chemotherapy model of poison for the forests to then help nests grow is not correct. Latest medical research all shows chemotherapy to be four times more dangerous than letting cancer self correct naturally. Chemotherapy actually kills!! In and of itself. Just like 1080.  
 q3: I don't disagree that birds are beautiful intelligent and wonderful. I do disagree that possums are not equally valuable fluffy fur babies full of affectionate love for those who have known them  
 q4: Please put down the poison. Everything dies from this. Its simply too gross and long a death. Imagine if a kid eats it!! People have pets who have!! Absolutely disturbing and violent  
 q5: non violent support for wildlife is great. More habitat, more food and water, more safe areas away from stressful sounds, more trees planted across city areas, bird feeders in every neighborhood, heck in every single garden. But absolutely no poison ☠️  
 q6:  
 q7: Look after all animals, not just the pretty or native, but everything that lives. Look at ferret here: <https://youtu.be/SaaWnun6Dz4>

Gorgeous precious wee fur babies!!

q8: No killing predator is not right possum prefers berries and seeds anyway, and one egg the if can't sentence an entire population to slow evil death penalty  
 q9: Sanctuary for animals, help people learn to love and embrace animal lives and teach veganism values. Of animal rights  
 q10: Undo the damage that you've done preaching murder, and teach kindness to furry little forest earth mothers children  
 q11:  
 q11comments:  
 q12:  
 q13: Recall kea had two dozen die and that's only the recorded ones. This stuff is so lethal and that's the surest thing there is  
 q14:  
 q15: Learn to love and treasure the possums please. Remember God creates you to learn how to love one another, not kill and harm but feed shelter care take in non violence for everyone not just some at the total devastation of others.

If we as a people consider land wars evil, because we might unfairly kill some for the other group, well, then we cannot kill possum, he doesn't eat bird!! There's a solution anyway even if his tummy had egg, its sanctuary zones. But, that's not even needed now we know he doesn't eat eggs.

**From:** [Redacted]  
**Sent:** Friday, 28 July 2017 7:35 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Fwd: Study that proves possums don't kill birds!!  
**Attachments:** 2834 (1).pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

----- Forwarded message -----

[Redacted]

Cc:

Hello,

stomach contents of the animals have no birds or egg!!! They are not guilty of this crime they are accused of!! Only the retarded bird conservation team that must constantly pressure you to approve poison are not looking at the facts!!! This study attached below looks at 26 possums and NONE HAD ANY BIRDS OR EGGS IN THEIR TUMMIES!!!! the morons at doc showcase a single video 365 days a year of one renegade possum eating an egg on their webpage. And yet they got away with poison for over 24 Kea!!!!!!

I realize it must be awfully hard to be pressured by all these greedy farmers and foolish belligerent so called bird lovers, but please, listen to the vegan team, the compassion in conservation, and the well known charity "safe" we are the real animal bird lovers and we have been listening to the hunters and fisherman vs the doc bird conservation groups and the vegans agree with the hunters!!! (For once only!!!) The bird conservation team are retarded they genuinely think they know better than all the careful studies showing possum hardly wants for more than berry seeds bark, I knew that because I have friends with pet possums!!! Rescue from roadkill pouches. So I know they don't eat egg, at even 1% of the rate that the poison kills kea, and a million other rare birds. Madness seems to have gotten into doc, they are filled with kids, and indoctrination and shown one video on repeat. They are not vegan, they profess forest nature love while supporting meat and dairy industry, the river destroyers, I have studied economics with statistics and I have read all the studies, this is what you need to know : 24+ kea confirmed poisoned. 26 possum: zero bird egg stomach contents. Please, stop the next round of death. The power is yours to read this study to the country.

[Redacted]

# New Zealand's Threatened Species Strategy: submissions for consultation

#70

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
*(if on behalf of an organisation)*

Email:

Signature:

*(we accept a typed signature if  
no electronic signature)*



**Submission:**

You can answer all or some of the questions.

- 1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**
  - Not enough vision here. A bigger target of threatened species should be aimed for.

- 2. Are there additional aspects that you think should be included in the vision?**

Habitats and Predators are not given enough strength. Seabirds again are under represented especially given that we are the seabird capital of the world.

- 3. Do you agree with the characterisation of the value and current state of our native species?**

Yes Agree with the value of our biodiversity.

- 4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

Support the adoption of a comprehensive National Policy Statement on Indigenous Biodiversity under the RMA.

Support greater use of legislation, regulation and policies to ensure that human actions do not further threaten species, for example zero bycatch of threatened species in the fishing industry, no clearance of threatened species habitats.

Development of a National Policy Statement on indigenous biodiversity is supported provided it sets bottom lines for biodiversity protection on private land, that will achieve the vision and the goals needed to protect and enhance all our Threatened and At Risk native species and prevent others becoming threatened.

- 5. Are there other tools we could use to help us achieve the vision?**

Maximise science. DNA studies. Predator control and offshore sustainable fishing methods should be enhanced

- 6. Will the proposed goals help us achieve the vision and assess our progress?**

Goals should be sensible and achievable. Long term thinking is needed to set a budget that will help achieve success. Tapping in to Polytech and Uni groups and departments



is essential. I have great faith in the enthusiasm and dedication of young scientists and environmentally motivated young people.

**7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

- No comment here. Goals and dates should be as fixed as possible.

**8. Have we identified the right strategic themes?**

The following additional themes should be included:

- Uniting all Government Agencies in an “all of government” response to threatened and at risk species to ensure all native species thrive.
- Maintaining genetic diversity and creating resilience

**9. Do you agree with our top 10 actions? -**

Yes with additions and amendments, as set out below.

**10 Are there any other actions that should be included, and any actions that should be removed?**

In addition to achieving the Predator Free 2025 goals and the Battle for our Birds response to masting events,

Increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control.

Develop a portfolio of priority areas for sustained and effective predator control beyond public conservation lands.

Amend Action 7 to; Develop and publish a portfolio of priority areas for threatened species protection on private land.

Amend Action 8 to select 1000 rather than 500 of the 3000 data deficient species for assessment.

Amend Action 9 to ensure that national recovery planning systems are not only fit for purpose but are also timely and implemented to achieve threatened species goals.

Add to Action 10 the development of a system for monitoring and regular public reporting on progress towards the goals.

Introduce regulations to achieve zero bycatch of threatened species in fisheries.

Expand the War on Weeds to include lupins, broom and willow on river beds and their margins

Add an action to identify and take opportunities to preferably purchase, or covenant habitats of threatened species.

**11. Have we identified the right number of priority species?**

(Circle or highlight one) • Too many • About right

• Too few

**Comments:**

The number of threatened species identified needs to be driven by what is actually required to safe guard our threatened species and ensure that their populations are resilient and thriving rather than fitting the prioritisation to the current lack funding.

**12. Have we identified the right priority species? No**

All the threatened species and those that are at risk and conservation dependent should be prioritised for enhancement by 2030

**13. Do you think other species should be prioritised ahead of the ones listed?**

**And why?**

Prioritisation should be dependent upon threat status, with account taken of the imminence of threats and be less influenced by the cost of management.

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

Not a strong vision. Disappointing considering NZ's special status as an island full of wildlife, much of it endemic and precious to the Earth's combined diversity.

There is a serious lack of focus on our shorebirds and seabirds.

**From:** [REDACTED]  
**Sent:** Friday, 28 July 2017 10:30 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Name:** [REDACTED]  
**Organisation:**  
**Email:** [REDACTED]

q1: No, not really. I think the vision is too conservative a goal to achieve growth and protection of our threatened and at risk species.

I would have thought a vision based on that recommended by the Parliamentary Commissioner for the Environment's recent Report on the situation of our native birds in NZ would be more appropriate and effective;

"The restoration of abundant, resilient and diverse species and habitats across their natural range."

The vision of this draft strategy needs to be ambitious and have a plan for all our threatened and at risk species e.g. All threatened and at risk species will be protected, not just 20% of them, and All threatened and at risk species that are dependent on conservation will be under intensive management plan now.

I support the vision for Predator Free NZ by 2050, but would suggest that other key introduced predators, such as pigs, mice and feral cats be included in DOC's own targeting, and that introduced browsers are carefully controlled and limited, both to ensure healthy flora for bird sustenance, and water quality protection.

I like "Battle for our Birds", but think it needs to be expanded so that all of the public conservation land needing predator control is under regular predator control. Too much bush is still in species decline. There needs to be landscape control of predators over large scale areas including private and forestry land where threatened species are known to live. Kiwi on the Coromandel are only doing OK where there is intensive predator control, but have disappeared from 40% of their range from just 20 years ago.

The "War on Weeds" also needs to be expanded from the dirty dozen as this is less than 4% of the 350 weeds which currently threaten nature. Weeds such as lupin, broom, poplar and gorse are urgently in need of control in some habitats where there are many threatened species such as braided river beds and lowland dryland sites

q2: Shore and sea birds need a higher profile as well as marine mammals. The draft strategy is heavily weighted towards terrestrial species. There is very little reference to marine life or actions for threatened marine species.

The vision and actions are lacking in information involving the responsibilities of all government agencies – central, regional and local government. There is a requirement for TAs through the RMA to have rules and regulations around protection of biodiversity on private land but that isn't highlighted in the draft strategy. The draft strategy needs to reflect a combined strategy which includes other agencies policies and actions to support the restoration of threatened and at risk species.

I support working together with Iwi to incorporate Te Ao Maori and Matuaranga Maori into the management of species/biodiversity especially in relation to co-management of species.

I think the role of science providers and research needs to be highlighted in the draft strategy.

q3: I agree with the current state of our native species, but there isn't any information about the impact of commercial harvest of threatened species, such as, whitebaiting and long finned eel harvest.

I think there needs to be better or even some management of commercial harvesting of threatened species such as whitebait, that may include bans.

There are major impacts to our biodiversity with clearance of habitats of threatened species through farming intensification, urban development and other infrastructure. This does not appear to be acknowledged in the draft strategy.

There needs to be more robust legislation to protect habitat of threatened species.

The National Policy Statement on Indigenous Biodiversity which was begun a number of years ago needs to be resurrected, and needs to set tight base lines for protection of species on both public and private land.

We need good data for our birds, reptiles, bats, invertebrates and marine species, clearly presented so we can see the trends for each species.

q4: The draft strategy should reflect a plan to manage all critically threatened species and have dedicated recovery plans and groups such as the kokako recovery group to actively manage their recovery.

There appears to be no reference to action plans or the development of action plans to implement or support the draft strategy, please include reference to action plans to implement the recovery programme for species.

There is no reference to resourcing the draft strategy. Please include how the strategy will be resourced. It is important to include a funding model or the strategy won't be achievable. The funding model should include other "partners" who work presently towards achieving the outcomes of the strategy and those who could in the future.

Too many species miss out around the prioritising of threatened species, which seems to be resource driven rather than need driven. Threatened species need to be managed to recovery or out of threatened species status.

All threatened species need a plan, not just the ones that have priority status. By providing plans for all threatened and at risk species, the road to recovery and removal from the Threat status classification list would be easier than being left to a situation when the species numbers are very low and need much more work to improve the numbers.

I submit that the protection of threatened species in situ is a priority and that captive management is a last resort. Species support ecosystems.

The development of native threatened plant and habitat protection legislation is supported.

I support the adoption of a comprehensive National Policy Statement on Indigenous Biodiversity under the RMA which sets bottom lines needed to protect and enhance all our threatened and at risk indigenous species and prevent others becoming threatened. This NPS needs to cover species protection on private land.

q5: I submit to adequately fund the protection of our threatened and at risk species by those responsible e.g. the Department of Conservation

I submit to continue to provide funds, such as, the Community Conservation Fund for community groups. These funds provide opportunities for government agencies to work with community groups and leverage the commitment of the volunteer sector.

It is important to have a section in the draft strategy that highlights the importance of monitoring and reporting to provide data and reports on how the draft strategy is reaching its goals.

There also needs to be clear tools for enforcement of legislation and information highlighting all agencies legislation e.g. central regional and local government.

The government needs to also adequately resource science to identify the threats and agents of decline and develop management prescriptions

I submit to strengthen DOCs advocacy role to provide a voice for threatened and at risk species and habitat as this has been weakened over the past few years, that would seem to be intentional and agenda driven.

q6: The draft strategy doesn't provide enough vision at this point to protect threatened and at risk species. Many more species need to be included. See below.

q7: I submit to increase the threatened the species under management to at least 50% by 2025.

I submit to provide information in the draft strategy to assess and report on how the goals are being achieved.

I submit to include information on data deficient species.

I submit that all threatened species need recovery plans.

q8: I submit to include a theme in relation to working with other government agencies such as regional and district councils.

I submit to include a theme on monitoring and reporting.

Highlight the concept of restoration and protection of the Mana and the Mauri of our Ngahere.

q9: Yes, essentially.

q10: Include an action to cover priority sites on private land that has threatened species present or adjacent to such as kiwi in or near Forestry blocks

Include information on landscape scale predator control to protect all PCL needing predator control to ensure regular sustained control

Include an action that details monitoring and reporting process to check on progress towards the goals.

Amend Action 8 to increase the number of 3,000 data deficient species from 500 to 1000

Amend Action 9 to ensure that national recovery planning systems are not only fit for purpose but are also timely and implemented to achieve threatened species goals.

Introduce actions to reduce or ultimate totally remove the number of sea bird species and marine mammal caught alongside commercial fisheries activities

Increase the number of weeds targeted in the War on Weeds to include lupins, broom and willow on river beds and their margins to protect the braided river birds

I support the partnership approach to species management which includes NGOs such as QEII, community groups, landowners, Charitable Trust and government agencies

I submit to include an action that states the resourcing to achieve the draft strategy

Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right • Too few

Comments:

The number of threatened species need to be increased to a level of need rather than prioritise to fit resources.

Have we identified the right priority species? No All threatened and those species with at risk status should have a management plan in place by 2030

Do you think other species should be prioritised ahead of the ones listed? And why?

Refer to the threat status for prioritisation and give attention to those with high classification.

Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

PFHC would like to see the draft strategy increase the number of species under management. At present the strategy only intends to manage 150 out of 800 threatened species at risk of extinction and 600 out of a further 2,200 species at risk of decline. That leaves the majority of threatened and at risk populations needing help now are not covered by the draft strategy's proposals for action.

Shore and sea birds marine mammals and freshwater species are not covered in the draft strategy.

The draft strategy needs information detailing what all government agencies are doing around species protection and improvement. This would include details on how they can work together.

Include policies and rules and regulations to protect species on private land not just PCL.

q11: toofew

q11comments: The number of threatened species need to be increased to a level of need rather than prioritise to fit resources.

q12: No. All threatened and those species with at risk status should have a management plan in place by 2030

q13: Refer to the threat status for prioritisation and give attention to those with high classification.

q14: I would like to see the draft strategy increase the number of species under management. At present the strategy only intends to manage 150 out of 800 threatened species at risk of extinction and 600 out of a further 2,200 species at risk of decline. That leaves the majority of threatened and at risk populations needing help now are not covered by the draft strategy's proposals for action.

q15: Shore and sea birds marine mammals and freshwater species are not covered in the draft strategy.

The draft strategy needs information detailing what all government agencies are doing around species protection and improvement. This would include details on how they can work together.

Include policies and rules and regulations to protect species on private land not just PCL.

**From:** [REDACTED]  
**Sent:** Saturday, 29 July 2017 10:14 a.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]

Organisation:

Email: [REDACTED]

q1: No, too many species left out

q2: More emphasis on habitat protection

q3: Yes

q4:

q5:

q6:

q7:

q8: Need Less emphasis on icon species and more on all native species

q9:

q10: More collaboration with all relevant agencies

q11: toofew

q11comments:

q12:

q13:

q14: Needs a wider vision

q15:

# New Zealand's Threatened Species Strategy: submissions for consultation

#73

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

[REDACTED]

Organisation name:  
*(if on behalf of an organisation)*

none

Email:

[REDACTED]

Signature:

[REDACTED]

*(we accept a typed signature if  
no electronic signature)*





**Submission:**

**You can answer all or some of the questions.**

**1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

*No – This vision lacks ambition when it comes to protecting our threatened and at risk native species. It needs to honour New Zealand's international commitments;*

*To restore viable populations of all our threatened and at risk species across their natural range and maintain their genetic biodiversity.*

*This could be encapsulated by a vision based on that recommended by the Parliamentary Commissioner for the Environment's recent Report on the state of our native birds.*

*“The restoration of abundant, resilient and diverse species and habitats across their natural range.”*

*To achieve this, the Strategy's vision needs to be much more ambitious than just aiming to safeguard 20% of our threatened species by 2030. Like Predator Free New Zealand it needs to aim high and look to safeguard all our threatened species by setting clear goals for significant increases in the number of threatened species that will be actively managed for their restoration; i.e.:*

- **All** threatened and at risk species will be protected, not just 20% of them, and
- **All** threatened and at risk species that are conservation dependent will be under intensive management setting them on a path to recovery.

*The vision for Predator Free NZ by 2050 – is supported. This needs to be expanded to include the other key introduced predators, especially mice, ferrets, weasels and feral cats.*

*“Battle for our Birds” is supported but needs to be expanded so that all of the public conservation land needing predator control is under regular sustained predator control. This would only cost around \$50 million a year (based on roughly 7million ha receiving control once every 3 years with an average cost of \$7 per ha).*

*Until we have eradicated all introduced predators we need to make sure that our threatened species survive and no more species become threatened. To do this we will also need comprehensive, landscape – scale, predator control on land outside of the conservation estate.*

*The “War on Weeds” also needs to be expanded from the dirty dozen as this is less than 4% of the 350 weeds which currently threaten nature. Weeds such as wilding pine, lupin, broom, poplar and gorse are urgently in need of control in some habitats where there are many threatened species such as braided river beds and lowland dryland sites.*

## 2. Are there additional aspects that you think should be included in the vision?

*The vision should address:*

- *the need to halt the loss of habitats that support threatened species*
- *Increased emphasis on improving our knowledge of the threats to, and conservation status of, species.*
- *Actions for threatened marine species.*

*The vision is focused on land based threatened species and actions to assist them, yet there are large numbers of sea birds threatened with extinction as well as dolphins, whales, sealions, marine fish and invertebrates.*

*The vision and actions of the Strategy need to incorporate an all-of-government approach to protecting threatened and at risk native species. The actions (or lack of action) of many government agencies have significant impacts on our threatened species. All government agencies should have a responsibility under the Strategy to ensure that their policies and actions support the restoration of threatened and at risk species, this includes LINZ and MPI.*

## 3. Do you agree with the characterisation of the value and current state of our native species?

*Yes Agree with the value of our biodiversity.*

*The Trouble in Paradise section of the strategy needs to recognise the impact of the commercial harvest of threatened species, such as whitebait species and Long finned eels, and the continued clearance of habitats of threatened species for commercial development such as marine farms, dairy farming intensification, urban expansion and infrastructure such as motorways.*

*The state of our species section needs to be more specific so that it is clear that for example what percentage of our birds, or reptiles, are threatened, and what the trends are for each group of species.*

## 4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

*The Strategy needs to require that all critically threatened species that would benefit from detailed management plans also have dedicated recovery groups that oversee the production and implementation of those plans.*

*The Strategy places too much emphasis on the need to prioritise the work between threatened species. This emphasis appears to be driven by the lack of resources, rather than conservation need. All threatened and conservation dependent species need to be managed for protection and there needs to be flexibility to be able to work on species that may not have been prioritised, but where an opportunity or a necessity arises.*

*Captive management should only ever be a last resort tool, as the priority for threatened species must be conservation in situ.*

*While Fenced sanctuaries serve a useful purpose, they should not be prioritised over conservation of threatened species in situ.*

*As the Parliamentary Commissioner for the Environment's recent report notes, translocations are expensive and risky and should be evaluated against the overall benefit of the species and against the benefit of using the same resources to control predators, or to provide other assistance in the in situ restoration of threatened species.*

*The development of native threatened plant and habitat protection legislation is supported.*

*Support the adoption of a comprehensive National Policy Statement on Indigenous Biodiversity under the RMA.*

*Support greater use of legislation, regulation and policies to ensure that human actions do not further threaten species, for example zero bycatch of threatened species in the fishing industry, no clearance of threatened species habitats.*

*Development of a National Policy Statement on indigenous biodiversity is supported provided it sets bottom lines for biodiversity protection on private land, that will achieve the vision and the goals needed to protect and enhance all our Threatened and At Risk native species and prevent others becoming threatened.*

## **5. Are there other tools we could use to help us achieve the vision?**

*The best possible tool is to ensure that the Department of Conservation is adequately funded to undertake all the steps necessary to restore all species at risk of extinction and to prevent others from becoming threatened.*

*DOC funding should be increased through a boarder levy on international arrivals. The full revenue of this levy should go to DOC to invest in fauna and flora on DOC land such as habitat protection and pest management.*

*The government needs to also adequately resource science to identify the threats and agents of decline and develop management prescriptions*

*Tools and resources are needed to ensure the monitoring and enforcement of existing legislation, policies and regulations at the central and regional and local government levels.*

*Utilise the Crown's tenure review process to secure high country threatened species habitats and ecosystems in Crown ownership and control.*

*Greater use of DOC's advocacy functions under resource management and other legislation to halt the decline of our biodiversity and enhance threatened species and their habitats.*

*Regulations are needed to require appropriate bycatch mitigation techniques, and transition to modern, low impact, fishing techniques.*

*The war on weeds needs to be expanded from just 13 of the 350 weeds known to be harmful to nature.*

## **6. Will the proposed goals help us achieve the vision and assess our progress?**

*The proposed goals need to be considerably more ambitious.*

*There are no goals to achieve enhancing all of our threatened and at risk species, or increasing knowledge about the many data deficient species so that no species are data deficient.*

*There is no goal setting out how progress will be assessed and publicly reported.*

*Goal 4 fails to set a target for assessing data deficient species*

## **7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

Amend the goals to include:

- *Enhance the populations of more than 50% of our threatened species so that they are on the road to recovery by 2025,*
- *Manage all threatened species requiring conservation intervention for protection so that no species should become more threatened*
- *All threatened and conservation dependent species should be actively managed for recovery by 2030.*
- *Reduce by kill of threatened species to ensure recovery to non threatened status*
- *Select 230 data deficient species every year so that by 2030 there are no data deficient species.*

## **8. Have we identified the right strategic themes?**

The following additional themes should be included:

- *Uniting all Government Agencies in an “all of government” response to threatened and at risk species to ensure all native species thrive.*
- *Maintaining genetic diversity and creating resilience*

9. Do you agree with our top 10 actions? -

*Yes with additions and amendments, as set out below.*

10 Are there any other actions that should be included, and any actions that should be removed?

*In addition to achieving the Predator Free 2025 goals and the Battle for our Birds response to maasting events,*

*Increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control.*

*Develop a portfolio of priority areas for sustained and effective predator control beyond public conservation lands.*

*Amend Action 7 to; Develop and publish a portfolio of priority areas for threatened species protection on private land.*

*Amend Action 8 to select 1000 rather than 500 of the 3000 data deficient species for assessment.*

*Amend Action 9 to ensure that national recovery planning systems are not only fit for purpose but are also timely and implemented to achieve threatened species goals.*

*Add to Action 10 the development of a system for monitoring and regular public reporting on progress towards the goals.*

*Introduce regulations to achieve zero bycatch of threatened species in fisheries.*

*Expand the War on Weeds to include lupins, broom and willow on river beds and their margins*

*Add an action to identify and take opportunities to preferably purchase, or covenant habitats of threatened species.*

11. Have we identified the right number of priority species?

(Circle or highlight one)

• Too many

• About right

• Too few

**Comments:**

*The number of threatened species identified needs to be driven by what is actually required to safe guard our threatened species and ensure that their populations are resilient and thriving rather than fitting the prioritisation to the current lack funding.*

12. Have we identified the right priority species? No

*All the threatened species and those that are at risk and conservation dependent should be prioritised for enhancement by 2030*

**13. Do you think other species should be prioritised ahead of the ones listed?  
And why?**

*Prioritisation should be dependent upon threat status, with account taken of the imminence of threats and be less influenced by the cost of management.*

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

*The overall framework is seriously lacking in ambition.*

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*The strategy focuses on terrestrial species, relying heavily on Predator Free NZ, Battle for our Birds and the limited War on weeds. There is a disappointing lack of focus on out shore and seabirds which are also facing significant threats or marine and freshwater species generally.*

*It fails to commit all government agencies to do their bit to meet the strategy's goals, especially for marine species, or commit the government to ensure that all of the public conservation lands needing predator control are under regular sustained predator control, and that there are effective policies and actions to protect threatened species on private land.*

**From:** [REDACTED]  
**Sent:** Saturday, 29 July 2017 2:25 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]

Organisation:

Email: [REDACTED]

q1: No. It doesn't protect our threatened & at-risk species in accordance with New Zealand's international commitment to RESTORE viable populations of ALL threatened & at risk species over natural range and genetic biodiversity.

Use the Parliamentary Commissioner for the Environment's recent report on the state of our native birds.

Use clear goals: to safeguard ALL our at-risk species by 2030 - not just 20% of them. Manage ALL at-risk species intensively to restore populations.

Expand the "Predator Free NZ by 2050" vision to include ALL introduced predators - including cats, mice, weasels & stoats.

Expand the "Battle for our Birds" - by eradicating all predators on Conservation land.

Expand the "War on Weeds" to other weeds like gorse, poplar, lupin & broom.

q2: Yes. Add:

Strategies to manage natural habitats so they will support at-risk species Promote research into species status and threats.

Include strategies to enhance viability of marine species including birds, dolphins, whales, sealions, fish & others. All government agencies need to work together & be accountable for the impact of their actions/non-actions that affect ALL habitats & species.

q3: Yes - agree that our biodiversity has enormous value.

The "Trouble in Paradise" section needs to mention commercial as well as private harvest of species under threat (e.g. whitebait, long-finned eel). Also, to make it clear that habitat destruction in the process of commerce or infrastructure development must be rectified.

q4: Lack of funding compromises attempts to help threatened species. We need to plan in detail what is essential in managing ALL at-risk species and their habitats, as situations change.

Management is better in situ rather than captivity. Make the natural environment safe & sustainable without disturbing existing populations where possible.

I support use of laws, regulation & policies to ensure human actions don't threaten species (zero bycatch in fishing industry, no clearance of threatened habitats).

If a National Policy Statement includes clear biodiversity protections of private land, I would support it.

q5: Government needs to:

Fund Department of Conservation well enough to achieve all of the above.

Fund scientific research and monitoring of our biodiversity and habitats.

Use Crown tenure reviews to protect high country habitats & species in Crown-controlled land.

Change the law to change the fishing industry to low-impact fishing & zero bycatch.

Expand War on Weeds to cover more species.

q6: They need to go further:

Need plans for studying & improving ALL at-risk species & habitats.

Need plans for monitoring & reporting species/habitat status to the public.

Goal 4 needs to suggest a goal in assessing species that are data deficient.

q7: Yes. These adjustments:

Restore at least 50% of threatened species to safe population levels by 2025.

Manage species so that no population becomes less viable.

Every year, improve data deficiencies in species - at least double the suggested goal.

q8: Include all government agencies in our response to native biodiversity.

Enhance biodiversity and species resilience by concentrating on genetic diversity.

q9: Yes - with the following provisos...

q10: As well as reaching 2025 Predator Free NZ goals and Battle for our Birds responses:

Increase and maintain higher predator control levels on all public & conservation lands.

Prioritise areas in private ownership for the same levels of predator control.

Amend Action 8 to select 1000 (not 500) of the 3000 data deficient species to monitor.

Amend Action 9 to make sure national recovery systems are effective and promptly deployed.

Introduce zero bycatch regulations in the fishing industry.

Expand War on Weeds to include gorse, broom, lupin, poplar & willow on river margins.

Add an action to identify & purchase or covenant at risk habitats.

q11: toofew

q11comments: Lack of funding should not hinder conservation requirements.

q12: No. ALL threatened species populations should be enhanced by 2030.

q13: Threats should drive conservation action to help species & habitats.

q14: It needs to go much further (see above).

q15:



# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
(if on behalf of an organisation)

Email:

Signature:

(we accept a typed signature if  
no electronic signature)



## Submission:

You can answer all or some of the questions.

### 1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

**No** - only aiming to protect 20% of threatened and at risk species by 2030 is a poor target:

*All threatened and at risk species must be protected*

**The vision for Predator Free NZ by 2050** – is supported but needs to be expanded to include the other key introduced predators, especially mice, ferrets, weasels and feral cats.

**“Battle for our Birds” is supported** but needs to be expanded so that all of the public conservation land needing predator control is under regular **cost effective** sustained predator control.

The **“War on Weeds”** also needs to be expanded from the dirty dozen as this is less than 4% of the 350 weeds which currently threaten nature. Weeds such as lupin and broom are a serious threat to birds nesting on braided rivers.

### 2. Are there additional aspects that you think should be included in the vision?

*The vision should address:*

- *the need to halt the loss of habitats that support threatened species*
- *Actions for threatened marine species.*

*The vision is focused on land based threatened species and actions to assist them, yet there are large numbers of sea birds threatened with extinction as well as dolphins, whales, sealions, marine fish and invertebrates.*

*The vision and actions of the Strategy need to incorporate an all-of-government approach to protecting threatened and at risk native species. The actions (or lack of action) of many government agencies **including the Department of Conservation**, have significant impacts on our threatened species. All government agencies should have a responsibility under the Strategy to ensure that their policies and actions support the restoration of threatened and at risk species.*

### 3. Do you agree with the characterisation of the value and current state of our native species?

**Yes Agree with the value of our biodiversity.**

*The Trouble in Paradise section of the strategy needs to recognise the impact of the commercial harvest of threatened species, such as **whitebait species, Long finned eels and seaweed**, as well as the continued clearance of habitats of threatened species for commercial development such as farming intensification, urban expansion and infrastructure such as motorways.*

*The state of our species section needs to be more specific so that it is clear that for example what percentage of our birds, or reptiles, or native plants are threatened, and what the trends are for each group of species.*

#### **4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

*~ The Strategy needs to require that all critically threatened species that would benefit from detailed management plans also have dedicated recovery groups that oversee the production and implementation of those plans.*

*~ The Strategy places too much emphasis on the need to prioritise the work between threatened species. This emphasis appears to be driven by the lack of resources, rather than conservation need. All threatened and conservation dependent species need to be managed for protection and there needs to be flexibility to be able to work on species that may not have been prioritised, but where an opportunity or a necessity arises.*

*~ Captive management should only ever be a last resort tool, as the priority for threatened species must be conservation in situ.*

*~ While Fenced sanctuaries serve a useful purpose, they should not be prioritised over conservation of threatened species in situ.*

*~ As the Parliamentary Commissioner for the Environment’s recent report notes, translocations are expensive and risky and should be evaluated against the overall benefit of the species and against the benefit of using the same resources to control predators, or to provide other assistance in the in situ restoration of threatened species.*

*~ The development of native threatened plant and habitat protection legislation is supported..*

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**The proposed goals need to be considerably more ambitious.**

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The following additional themes should be included:

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## **9. Do you agree with our top 10 actions? -**

*Yes with additions and amendments, as set out below.*

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(Circle or highlight one)

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# New Zealand's Threatened Species Strategy: submissions for consultation

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### Submitter details:

Name of submitter or contact person:	[Redacted]
Organisation name: <i>(if on behalf of an organisation)</i>	
Email:	[Redacted]
Signature: <i>(we accept a typed signature if no electronic signature)</i>	[Redacted]

## Submission:

You can answer all or some of the questions.

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[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Saturday, 29 July 2017 11:41 p.m.  
**To:** threatenedspeciesstrategy  
**Cc:** [REDACTED]  
**Subject:** Barbaric 1080 poison

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Sir, madam:

We demand the immediate cessation of the use of 1080 poison baiting in New Zealand!

This poison is an inhumane, insidious and indiscriminate way of exterminating animals - it poses a danger to ANY animal or human that may unwittingly come across it and consume it as it is scattered randomly in wildlife areas, forests, farms and national parks!

Please ban the use of 1080 poison!

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**Sent:** Sunday, 30 July 2017 1:24 a.m.  
**To:** threatenedspeciesstrategy  
**Cc:** [REDACTED]  
**Subject:** NZ. Ban barbaric 1080 poison!

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I write to protest the Fallacious Indiscriminate Babrabric poisoning of our forests and all who live in them and the pollution of air land and water with 1080.

One fallacy of 1080 poisoning is the fact that the target species, viz, Possums and Rats DO NOT Eat baby Birds or Eggs. They are falsely blamed for this and villified and persecuted.

So the entire practice is based on this false premise as well as the erroneous concern about Herbivores eatong foliage which Moa used to do and whom we need Possums, Deer, Tahr, Chamois, Goats and Boar to replace and thus fertilise the forest.

New zealand forests are losing soil fertility due to the loss of 6 to 12 million giant Moa.

Rodents live in Forests everywhere else in the world and are scavengers who clean the environment as are Possums.

Everyone has a place in a Dynamic environment. 1080 Rats' and Possums' Diets.

Originally the forests in NZ Housed and Fed 6 to 12 million Browsing Moa, a giant Bird, and grazing Kakapo, large parrots, and Myriad other Birds most of whom have been killed by Invading Humans. The Moa and Other Birds fertilised the soil with their excrement.

Since the demise of the Moa who are now extinct and the Kakapo who are near extinct Soil Fertility has been declining to the extent that Trees are affected eg. Kauri Die-back.

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Sincerely,



Beligum

**Laura Mansfield**

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**From:** [REDACTED]  
**Sent:** Sunday, 30 July 2017 5:43 a.m.  
**To:** threatenedspeciesstrategy  
**Cc:** [REDACTED]  
**Subject:** Re. 1080 poison!

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Madam, dear Sir,

I write to protest the Fallacious Indiscriminate Babrabric poisoning of our forests and all who live in them and the pollution of air land and water with 1080.

One fallacy of 1080 poisoning is the fact that the target species, viz, Possums and Rats DO NOT Eat baby Birds or Eggs. They are falsely blamed for this and villified and persecuted.

So the entire practice is based on this false premise as well as the erroneous concern about Herbivores eatong foliage which Moa used to do and whom we need Possums, Deer, Tahr, Chamois, Goats and Boar to replace and thus fertilise the forest.

New zealand forests are losing soil fertility due to the loss of 6 to 12 million giant Moa.

Rodents live in Forests everywhere else in the world and are scavengers who clean the environment as are Possums.

Everyone has a place in a Dynamic environment. 1080 Rats' and Possums' Diets.

Originally the forests in NZ Housed and Fed 6 to 12 million Browsing Moa, a giant Bird, and grazing Kakapo, large parrots, and Myriad other Birds most of whom have been killed by Invading Humans.

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[REDACTED] [to 1080 eyewitness](#)

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Sincerely,

  
Serbia

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Sunday, 30 July 2017 5:33 a.m.  
**To:** threatenedspeciesstrategy  
**Cc:** [REDACTED]  
**Subject:** Re. 1080 poison!

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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[REDACTED]  
Serbia

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Sunday, 30 July 2017 7:36 a.m.  
**To:** threatenedspeciesstrategy  
**Cc:** [REDACTED]  
**Subject:** NZ. Ban barbaric 1080 poison!

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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[REDACTED]  
Austria



# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter or contact person:

[Redacted]

Organisation name: *(if on behalf of an organisation)*

Collaborative submission by below listed Hauraki Coromandel conservation groups and individuals

Email:

[Redacted]

Signature:

*(we accept a typed signature if no electronic signature)*

[Redacted]

[Redacted]

[Redacted]

[Redacted]

## Submission:

You can answer all or some of the questions.

### 1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

We consider the proposed vision to be a conservative goal to achieve growth and protection of our threatened and at risk species.

We suggest the use of a vision based on that recommended by the Parliamentary Commissioner for the Environment's recent Report on the situation of our native birds in NZ.

"The restoration of abundant, resilient and diverse species and habitats across their natural range."

The vision of this draft strategy needs to be ambitious and have a plan for *all* our threatened and at risk species e.g.

- **All** threatened and at risk species will be protected, not just 20% of them, and
- **All** threatened and at risk species that are dependent on conservation will be under intensive management plan now.

The vision for Predator Free NZ by 2050 is supported. We would suggest that other key introduced predators, especially mice, ferrets, weasels, hedgehogs, wasps, and feral cats be included.

"Battle for our Birds" is supported but needs to be expanded so that all of the public conservation land needing predator control is under regular predator control. There needs to be landscape control of predators over large scale areas **including private land** where threatened species are known to live or expand their territory, such as kiwi on the Coromandel living on private land and forestry land.

The "War on Weeds" also needs to be expanded from the dirty dozen as this is less than 4% of the 350 weeds which currently threaten nature. Weeds such as lupin, broom, poplar and gorse are urgently in need of control in some habitats where there are many threatened species such as braided river beds and lowland dryland sites.

### 2. Are there additional aspects that you think should be included in the vision?

The vision needs to give a higher profile to shore and sea birds and to marine mammals. The draft strategy is heavily weighted towards terrestrial species. There is very little reference to marine life or actions for threatened marine species.

The vision and actions are lacking in information involving the responsibilities of all government agencies – central, regional and local government. There is a requirement for territorial authorities through the RMA to have rules and regulations around protection of biodiversity on private land but that isn't highlighted in the draft strategy. The draft strategy needs to reflect a combined strategy which includes other agencies' policies and actions to support the restoration of threatened and at risk species.

There is no mention of policies such as the Regional Policy Statement of the Waikato Regional Council which has biodiversity policies with rules and regulation to contribute to the improvement of biodiversity.

We support working together with Iwi to incorporate Te Ao Maori and Mataranga Maori into the management of species/biodiversity especially in relation to co-management of species.

We submit to have the research with science providers highlighted in the strategy.

We submit to include relationship with other government agencies such as regional and district councils and MPI to strengthen this draft strategy. It is important for these agencies to work together, and they do now in many ways, to improve biodiversity outcomes and achieve common goals for terrestrial and marine species.

### **3. Do you agree with the characterisation of the value and current state of our native species?**

We agree with the characterisation of the current state of our native species.

We note that there isn't any information about the impact of commercial harvest of threatened species, such as whitebaiting and long-finned eel harvest.

We submit to include the management of commercial harvesting of threatened species such as whitebait.

We submit to include the major impacts to our biodiversity as being clearance of habitats of threatened species through farming intensification, urban development and other infrastructure. This does not appear to be acknowledged in the draft strategy.

We submit to provide more robust legislation to protect habitat of threatened species.

We also support the implementation of a National Policy Statement on Indigenous Biodiversity which was begun a number of years ago and shelved. This policy however needs to set tight base lines for protection of species on both public and private land.

We submit to state what percentage of our birds, reptiles, bats, invertebrates and marine species are threatened and what the trends are for each species.

### **4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

We would like the draft strategy to reflect a plan to manage all critically threatened species and have dedicated recovery plans and groups, such as the North Island Kokako Recovery Group, to actively manage their recovery.

There appears to be no reference to action plans or the development of action plans to implement or support the draft strategy.

We submit to include reference to action plans to implement the recovery programme for species.

There is no reference to resourcing the draft strategy. We submit to include how the strategy will be resourced. It is important to include a funding model or the strategy won't be achievable. The funding model should include other "partners" who work presently towards achieving the outcomes of the strategy and those who could in the future.

We are concerned about the prioritising of threatened species which seems to be resource driven rather than the need of the threatened species to be managed to recovery or out of threatened species status.

We submit to provide plans for all threatened species not just the ones that have priority status. By providing plans for all threatened and at risk species, the road to recovery and removal from the Threat status classification list would be easier than being left to a situation when the species numbers are very low and need much more work to improve the numbers.

We submit that the protection of threatened species *in situ* is a priority and that captive management is a last resort.

The development of native threatened plant and habitat protection legislation is supported.

We support the adoption of a comprehensive National Policy Statement on Indigenous Biodiversity under the RMA which sets bottom lines needed to protect and enhance all our threatened and at risk indigenous species and prevent others becoming threatened. **This NPS needs to cover species protection on private land.**

## 5. Are there other tools we could use to help us achieve the vision?

We submit to adequately fund the protection of our threatened and at risk species by those responsible, e.g. the Department of Conservation.

We submit to continue to provide funds, such as the Community Conservation Fund, for community groups. These funds provide opportunities for government agencies to work with community groups to continue their critical projects and to leverage the growing commitment of the volunteer sector.

It is important to have a section in the draft strategy that highlights the importance of monitoring and reporting to provide data and reports on how the draft strategy is reaching its goals.

There also need to be clear tools for enforcement of legislation and information highlighting all agencies' legislation, e.g. central, regional, and local government.

The government needs to also adequately resource science to identify the threats and agents of decline and develop management prescriptions.

We submit to strengthen DOC's advocacy role to provide a voice for threatened and at risk species and habitat as this has been weakened over the past few years.

**6. Will the proposed goals help us achieve the vision and assess our progress?**

The draft strategy doesn't provide enough vision at this point to protect threatened and at risk species. We submit to include many more species. See point below.

**7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

We submit to increase the threatened species under management to at least 50% by 2025.

We submit to provide information in the draft strategy to assess and report on how the goals are being achieved.

We submit to include information on data deficient species, e.g. Coromandel striped gecko.

We submit that all threatened species need recovery plans.

**8. Have we identified the right strategic themes?**

We submit to include a theme in relation to working with other government agencies such as regional and district councils.

We submit to include a theme in relation to working with existing community conservation groups through nurturing, growing, and linking.

We submit to include a theme on monitoring and reporting.

**9. Do you agree with our top 10 actions?**

Yes with additional submission points made below.

**10 Are there any other actions that should be included, and any actions that should be removed?**

We submit to:

Include an action to cover priority sites on private land that have threatened species present or adjacent to, such as kiwi in or near Forestry blocks.

Include information on landscape scale predator control to protect all PCL needing predator control to ensure regular sustained control to benefit multiple At Risk and Threatened species.

Include an action that details monitoring and reporting process to check on progress towards the goals.

Amend Action 8 to increase the number of 3,000 data deficient species from 500 to 1000.

Amend Action 9 to ensure that national recovery planning systems are not only fit for purpose but are also timely and implemented to achieve threatened species goals.

Introduce actions to reduce or ultimately totally remove the number of sea bird species and marine mammal caught alongside commercial fisheries activities.

Increase the number of weeds targeted in the War on Weeds to include lupins, broom and willow on river beds and their margins to protect the braided river birds.

Support the partnership approach to species management which includes NGOs such as QEII, community groups, landowners, Charitable Trust and government agencies.

Include an action that states the resourcing to achieve the draft strategy.

**11. Have we identified the right number of priority species?**

(Circle or highlight one)      • Too many      • About right

• Too few

**Comments:**

The number of threatened species need to be increased to a level of need rather than prioritise to fit resources.

**12. Have we identified the right priority species?**

No. All threatened and those species with at risk status should have a management plan in place by 2030.

**13. Do you think other species should be prioritised ahead of the ones listed? And why?**

Refer to the threat status for prioritisation and give attention to those with high classification.

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

We would like to see the draft strategy increase the number of species under management. At present the strategy only intends to manage 150 out of 800 threatened species at risk of extinction and 600 out of a further 2,200 species at risk of decline. That leaves the *majority* of threatened and at risk populations needing help now not covered by the draft strategy's proposals for action.

Shore and sea birds, marine mammals, and freshwater species are not covered in the draft strategy.

The draft strategy needs information detailing what all government agencies are doing around species protection and improvement. This would include details on how they can work together.

Include policies and rules and regulations to protect species on private land not just PCL.



30 July 2017

## SUBMISSION ON DRAFT THREATENED SPECIES STRATEGY

### Introduction

The Board of the Otari-Wilton's Bush Trust welcomes the opportunity to comment on the Draft Threatened Species Strategy.

### Some key points

1. The draft DTSS says little about the importance of protecting threatened plants and the ecosystems in which they live. It would be regrettable if decision-making about biodiversity by DOC and Government for the next eight years were to be constrained by a strategy similar to the DTSS.
2. We want to see more recognition of the importance of plants and ecosystems in the final TSS. Too many people appear to equate threatened species with birds and perhaps a few other animals, e.g. dolphins and tuatara. They don't seem to understand that vertebrates and invertebrates need plants for food, shelter and protection. We are looking for a stronger focus on ecosystem management in the final TSS, i.e. managing and enhancing populations of all threatened species in the places where they live. This will need to be complemented by enhanced capabilities in ex-situ plant conservation as more plants are likely to face more threats in the wild if society focuses on saving 'special wildlife'.
3. The new partnership between DOC and the New Zealand members of BGANZ is welcome news. This initiative will enhance DOC's access to additional capabilities in ex-situ techniques. Ex-situ conservation involves much more than storing seeds in seed-banking facilities. We have had the privilege of observing the work done by Otari-Wilton's Bush staff and external researchers in propagating threatened plants for replanting in the wild, e.g., *Brachyglottis kirkii* var *kirkii*, *Pimelia actea*, and *Olearia adenocarpa*.
4. The DTSS describes the benefits of the BGANZ partnership as "achieving more research, reducing costs, and increasing the efficiency and effectiveness of plant conservation work". (p21). It will do some of that within the current budget constraints faced by the seven member gardens and DOC, but it could do so much more. We hope DOC will support the partnership in at least three ways; with direct funding including staff time; by promoting plant conservation when talking to philanthropists, councils and school groups; and by advocating for increased investment in the DOC-BGANZ partnership. MPI and the National Science Challenges both have responsibilities to enhance New Zealand's ability to respond when pathogens like kauri die-back and myrtle rust, and other invaders cross the border.

5. Many New Zealanders may be unhappy when they realise that Kauri and well-known species of Myrtaceae are not among the “notable” species Government wants to enhance under Goal 2. We hope these species are already on the list of un-named plant species to be managed under Goal 1. The consequences of not starting until 2025 could be very serious.
6. Kauri and many Myrtaceae are of cultural significance to Māori. Under the DTSS Goal 3, iwi and Post Settlement Governance Entities are likely to expect a significant role in planning for the enhancement of these species. (See Teulon, DAJ and others (2015) *The threat of myrtle rust to Māori taonga plant species in New Zealand*, New Zealand Plant Protection). They may not welcome a directive from Government or DOC’s national office telling them the priority species for conservation.
7. We couldn’t find a clear explanation of what Predator Free NZ Ltd will contribute to the management of the EMUs on public conservation land. Will it also be killing predators on the extensive areas of land that are not in EMUs?
8. We look forward to finding more detailed costings for delivering the four goals in the Briefing to the Incoming Minister of Conservation (2017). A summary of progress to date and the next steps on implementing Government’s whole of government Biodiversity Action Plan 2016-2020 would also be welcome.

### **Why are there so few threatened plants on the priority lists?**

9. Around 927 species of New Zealand’s indigenous vascular plants are either threatened with extinction or risk becoming so. (Calculated from 39% of 2,378 species<sup>1</sup>). The DTSS aims to enhance 39 of these plant species under Goal 2 by 2025; five from the list of 50 ‘notable’ species, and 34 from the list of 100 species selected using ‘scientific’ criteria. At one level, it’s disappointing to see so few plants on the list. But enhancing the populations of these 39 plant species by 2025 would be a major achievement given the limited funding allocated to plant conservation.
10. A further but unknown number of other threatened and at-risk plant species will be managed for protection under Goal 1, as the total number of species under management rises from around 355 (now) to 500 in 2025, and 600 in 2030 (overall a 70% increase with no new funding). We will be surprised if successes under Predator Free New Zealand and the War on Weeds will free up sufficient funds to achieve this increase (see p.28). ‘Managed for protection’, however, only promises an input; we fear it may be achieved by reducing the effort DOC puts into managing each of the 600 species or 1000 EMUs, leaving more on the ground work to iwi, communities and volunteers.

### **Why does New Zealand have so many threatened and at risk plants? (Trouble in Paradise)**

11. Plants face many more threats than animals, but the DTSS identifies only a few of these:
  - a small diagram on p.10 shows five threats (herbivores, weeds, changes in land-use, industrialisation, and illegal activities)
  - pathogens are mentioned in two Spotlights (Myrtle Rust, kauri die-back)
  - browsers are mentioned briefly in the final paragraph of *Trouble in Paradise*.

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<sup>1</sup> Statistics New Zealand and the Ministry for the Environment 2015: *New Zealand’s Environmental Reporting Series Environmental Aotearoa 2015*.



12. Other threats to threatened plants which should be acknowledge include:
  - omnivores (e.g. mice, possums, rats)
  - physical damage by people, e.g., trampling and off-road vehicles
  - destruction of habitats and small populations by fires, earthquakes, floods, droughts, and landslips
  - plant-blindness
  - climate change.
13. Plant blindness is a concept used by Balding, M and Williams, K. (2016), and others to explain why “plant conservation initiatives lag behind and receive considerably less funding than animal conservation projects”. (Conservation Biology Vol. 30, Issue 6, December 2016).
14. The *Trouble in Paradise* section should also refer to the disruption of plants’ reproductive processes as a result of fragmented populations, low fertility, in-breeding depression, gender-imbalances, low recruitment rates etc.
15. The DTSS mentions very few ways of protecting plants. We found three weed control programmes (wilding conifers, the Dirty Dozen, biocontrols), one ex-situ technique (storing seeds in a recognised seed storage facility), and the translocation of *Dactylanthus*. Fences don’t rate a mention other than for fenced sanctuaries. Are they now too expensive for landscape scale initiatives like keeping grazing stock out of public conservation land? Surely small-scale fences to provide safe places for rare plants to germinate can be justified?

### **Why are there so few success stories about plants in the Spotlights?**

16. Tourists to Otari-Wilton’s Bush from cruise ships love hearing about the kākābeak initiative (Spotlight p.31). However, it’s the only Spotlight in the DTSS to highlight progress towards the recovery of a threatened plant species. Can DOC report progress on enhancing the populations of their plant species in the wild? A Spotlight about the work done by Motukarara Nursery in supporting the conservation of Canterbury’s plants and gene pools may help improve the balance.
17. We suspect there are few Spotlights about plants because plant conservation has suffered from a lack of funding for many years. ECO LINK, (Jan-April 2017) reports a shortfall of funding of over \$100 million annually for threatened species work and biodiversity protection.

### **How were the 150 priority species chosen?**

18. We are dissatisfied by the explanation on page 31 that the 50 ‘notable’ species are notable to the public. This is not an acceptable methodology for determining the priority species for threatened species conservation for the next 8 years. Some of the named species are not even ‘Threatened’, but only ‘At risk’.
19. We have more confidence in the methodology used to choose the other 100 species, and were pleased to find the Algorithm on the website. We suggest you add some Frequently Asked Questions (and answers) in a TSS Appendix so clear explanations are readily available to help DOC staff and others explain the system. One key question that needs an answer is why are there seven cresses, among the 34 priority plant species on the list of scientific priorities (6 *Lepidium*s and 1 *Pachycladon*)?

20. We were pleased to learn that DOC has determined the conservation status of more non-vascular plants, but there are still 1,165 data deficient species. When and how is DOC planning to increase its capability and capacity for monitoring non-vascular plants?

### **How will the Strategy contribute to the conservation of rare and threatened ecosystems?**

21. We'd like to know which ecosystem each of the priority species comes from because managing these species may contribute to the conservation of rare or threatened ecosystems. We recommend a weighting towards wetlands and dune species in the list of 'notables' as these are New Zealand's most threatened ecosystems. DOC's SOI 2016-20 mentions a National Dune Management Plan.

### **Why doesn't the Strategy have a strategic theme and some key action about controlling herbivores?**

22. The DTSS has no linkages to the herbivore programme in the New Zealand Biodiversity Action Plan 2016-2020 which says:  
*By 2020, browsing herbivores will be effectively controlled over a greater extent of forested ecosystems to minimise their impact on indigenous tree populations (DOC, partners).*
23. Herbivores also need to be controlled in non-forested ecosystems such as dunelands, sub-alpine scrub, wetlands etc. where some of the priority species live. DOC's Annual Report 2016 says that while possums and hares have invaded nearly all public conservation land, they have invaded almost mutually exclusive areas. Hares travel to much higher altitudes, threatening alpine and sub-alpine ecosystems. We'd like to know what DOC intends to do about hares and other herbivores. What about initiating a Herbivore-Free New Zealand campaign and programme in 2020?

### **What key learnings have resulted from any reviews of the existing Plant Recovery Plans?**

24. Between 1993 and 2004, DOC developed recovery plans for nine plant species or groups of species (See Appendix 1). Four of these species are not on the list of 150 species: Shrubby tororaro (*Muehlenbeckia astonii*), *Leptinella nana*, *Pittosporum patulum* and *Veronica (hebe) cupressoides*. We thought management of all species already under management would continue, to avoid wasting the resource already invested. Many plants of *M. astonii* are now in cultivation, but what has been achieved for populations in the wild, and its genetic diversity? The one North Island population of *Leptinella nana* at Titahi Bay is managed by one volunteer, a former staff member at Otari Wilton's-Bush. (There are two South Island populations). Perhaps management by a volunteer doesn't qualify this species to be among the priority 100.

### **Next steps: prescriptions for individual taxa**

25. Each species on the list will need an individualised conservation plan (prescription) that take into account its biotic and abiotic requirements, its location and ecological setting, the local threats (current and future), the nature of the work to be done, the mix of tools that are most likely to be effective, and knowledge of what may or may not work. Better information about the genetic variability within and between populations of each threatened species nationally and regionally has the potential to contribute to more efficient decision-making about priorities for collecting germ plasm for ex-situ initiatives. This work should be

described in the final TSS to show its complexity relative to killing predators and wilding conifers.

26. Fenced sanctuaries and island reserves offer safe sites for populations of plants raised by ex-situ conservation. Predator Free 2025 intends to remove all predators from all island reserves. Why not remove herbivores and weeds at the same time to make more use of island reserves and mainland islands suitable for plant conservation? A Spotlight about the successful propagation of the palatable Kirk's Daisy at Otari-Wilton's Bush, and its subsequent planting into Zealandia, a fenced sanctuary, would explain some of the challenges of enhancing the populations of threatened plants.

### **What happens after wilding pines are controlled?**

27. We welcomed the target in New Zealand's Biodiversity Action Plan (2016-2020) for the control of wilding pines.

*By 2020, approximately 500,000 ha of existing scattered wilding conifer infestation will be removed and we will have transitioned to coordinated landscape-scale management across the most significantly affected regions (MPI, DOC, LINZ, partners). (Target 4.6):*

28. The DTSS says nothing about Government's plans for restoring these areas after the current infestations have been removed. Will they be left to regenerate through natural processes, e.g. (wind, birds), or will more active forms of restoration be funded at a landscape scale to reduce the regeneration rate of the conifer seed-bed?

### **The language of war**

29. Both the Minister and the Director-General make no apology for using the language of war. The language of war may be appropriate if your only goal is to kill pests. But the use of the language of war may also signal a willingness to accept collateral damage and unanticipated consequences by commission and/or omission.
30. The language of war may be appropriate when dealing with dense populations of environmental weeds like wilding conifers or hawkweed, but such "bombings" will need to be supplemented with guerrilla warfare, i.e. hunting out the outliers that may act as a seed sources for re-invasions.
31. Threatened plants collectively face many risks, and some face multiple threats. Safeguarding their diversity will require the more sophisticated language and approaches of diplomacy. This includes increasing staff's familiarity with plant conservation terms and methods including seed-banking, cryobanking, tissue-culture, and field gene banks.

### **How will the impact of Predator Free New Zealand be monitored?**

32. We welcome the improvements Predator Free New Zealand 2050 will make to the conservation of some birds, reptiles and invertebrates. We wonder why the benefits to plant conservation of controlling possums and rats are not mentioned. We suspect this is to avoid having to acknowledge that possums and rats are omnivores, not predators.

33. Please, can DOC add monitoring of the recovery and recruitment rates for some palatable plant species to the PFNZ 2050 deliverables, e.g., it may be possible to detect red mistletoe flowers with drones over beech forests during the flowering season.
34. The analysis of the changes in vegetation after 10 years of Project Kaka may shed more light on the effects of 'predator' control on plants. It's due to be released within the next year.

**How will Government identify and address any unforeseen consequences of Predator Free New Zealand that may be ecologically harmful or expensive in the longer term?**

35. The DTSS reports (without a reference) that 25 million native birds are killed by predators every year, but doesn't estimate exotic bird fatalities. Hundreds of millions of additional birds, native and introduced, will survive as predators are controlled over the next 8 to 30 years. The potential impacts need to be identified and modelled. For example, higher bird populations will eat higher proportions of the flowers, berries and seeds produced by some indigenous plant species, leaving fewer plants to produce the next generation, exacerbating a threat to plant conservation. If eaten seeds are subsequently deposited in unsuitable habitats, the chances of the original populations remaining self-sustaining may decrease. Birds may also carry many millions of exotic seeds and fruits into natural and recovering ecosystems. Some seeds may not germinate in dense forests, where light levels are low, but elsewhere they may result in new or additional weed infestations and changes in ecosystem composition. These changes may be exacerbated by climate change. Please acknowledge these risks and outline DOC's plans for monitoring and modelling such changes.

**Social context**

36. The DTSS makes no mention of various social and personal factors that may support or undermine involvement in threatened species conservation. In December 2012, the Controller and Auditor-General's report on partnerships said: "Staff and stakeholders questioned the viability of DOC's strategy to increasingly achieve biodiversity gains through community and commercial partnerships, especially in regions with lower socio-economic characteristics or smaller populations to draw from".
37. Nor has the DTSS recognised the need for higher levels of public awareness of the less-charismatic specie if people are going to be motivated to protect them. Charismatic species remain the focus of most media releases, photo-opportunities, speeches and articles in *What's Up DOC*. Exceptions include Nicola Toki's item in October 2016 about *Pimelia actea* on Radio NZ, and Lou Sanson's account of his reaction to learning that Bartlett's Rata was rarer than the kākāpo.
38. There are some exciting case studies in Government's "Environmental Education for Sustainability" strategy announced by Associate Minister of Conservation on 26 July 2017, e.g. *Kids Greening Taupo*, and *Looking at moths through a Māori lens*. These case studies help develop young people's biodiversity literacy, i.e., their understanding of more of our unique flora and fauna, its contribution to our national identity, past conservation successes and mistakes, and future choices. It may help also reduce "plant blindness".
39. The EEfS strategy also makes the following commitment to Predator Free education resources. Perhaps this deliverable should be included in the final TSS?

*Education will be a vital part of developing momentum and gaining support, buy-in and participation from all New Zealanders to achieve this predator-free vision.*

*Predator Free 2050 is developing a toolkit to help communities carry out predator free-related projects, seek information and connect with others. For kindergartens, schools and tertiary institutions, Predator Free 2050 offers a rich context for cross-curricular learning and for forging connections within their community.”*

40. We hope it will explain the difference between a predator, a herbivore, and an omnivore.

### **Top 10 Actions and NZ Biodiversity Action Plan 2016-2020**

41. Low levels of awareness of the NZ Biodiversity Action Plan 2016-2020 (BAP) may account for one of our criticisms of the DTSS; the lack of alignment between DTSS goals and the Top 10 Action Points. The BAP is a short-term, wide-ranging, whole-of-Government plan for addressing biodiversity issues; not everything has to be in the TSS. A diagram and some high level information about BAP achievements and the ‘next steps’ by other agencies may help readers appreciate the wide range of actions Government is taking to safeguard New Zealand’s biodiversity and the natural environment.

### **International obligations**

42. Page 14 mentions several of New Zealand’s international reporting obligations for biodiversity. If New Zealand endorsed the Global Strategy for Plant Conservation (GSPC), it should also be on p.14 because at least twelve of its 16 targets have implications for New Zealand’s Threatened Species Strategy, (see Appendix 2).
43. More of the Aichi Biodiversity targets for the 2011-2020 period should be in the final DTSS, so New Zealanders understand how NZ’s reputation may suffer when officials submit the 6<sup>th</sup> (and final) National Report to the CBD in December 2020. For example:
- National Target 12: More Threatened, At Risk or Declining species are managed to the extent necessary to minimise extinction risk and ensure genetic biodiversity is maintained.
  - National Target 6: Improved understanding of the impacts of climate change on biodiversity informs better management of vulnerable ecosystems and indigenous species.
44. Under the original New Zealand Biodiversity Strategy and Action Plan 2000, New Zealand committed to:
- Cooperate and work with other countries on biodiversity issues of mutual concern and in areas in which New Zealand has particular expertise or needs, such as research on shared taxa, threatened species management and recovery, prevention and elimination of invasive species, biological restoration techniques, and biodiversity assessment. Key players: will vary, DoC, MAF, Mfish, FRST, MFAT, research providers.*
45. This commitment appears to have been dropped from the BAP, and we found nothing in the DTSS about DOC staff continuing to help other countries, particularly our South Pacific neighbours, develop their biodiversity management competencies. Has DOC been forced reduce its input to New Zealand’s foreign aid programmes by its funding constraints and the wide-ranging stretch targets in the SOI?

46. DOC's support of CITES, which helps prevent illegal trade in threatened species throughout the world, may also require additional resources for compliance and enforcement activities given the forecast growth in international tourism.

[REDACTED]

[REDACTED]

[REDACTED]

## APPENDIX 1: RECOVERY PLANS FOR THREATENED PLANTS (1993 - 2004)

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**Kowhai ngutukaka recovery plan (*Clianthus puniceus*).** W.B. Shaw 1993. *Threatened Species Recovery Plan 8*. 31 p. (Out of print.)

Part 1: ([PDF, 311K \(opens in new window\)](#)) Part 2: ([PDF, 239K \(opens in new window\)](#))

***Dactylanthus taylorii* recovery plan.** C.E. Ecroyd 1995. *Threatened Species Recovery Plan 16*. 27 p. (Out of print.) ([PDF, 575K \(opens in new window\)](#))

***Dactylanthus taylorii* recovery plan 2004–2014.** 2005. *Threatened Species Recovery Plan 56*. 30 p. ([PDF, 151K \(opens in new window\)](#))

**Coastal Cresses (Nau) Recovery Plan.** D.A. Norton; P.J. de Lange 1999. *Threatened Species Recovery Plan 26*. 71 p. ([PDF, 992K \(opens in new window\)](#))

**Inland *Lepidium* recovery plan. 2000-2010.** R.B. Allen. 2000. *Threatened Species Recovery Plan 32*. 25 p. (Out of Print.) ([PDF, 137K \(opens in new window\)](#))

**Recovery plan for threatened grassy plants of dry fertile sites, 2003–2013.** C. Jones 2004. *Threatened Species Recovery Plan 52*. 28 p. ([PDF, 717K \(opens in new window\)](#))

**Protection and recovery of the pygmy button daisy 2001-2011.** *Threatened Species Recovery Plan 34*. 36 p. ([PDF, 1 227K \(opens in new window\)](#))

***Hebe cupressoides* recovery plan. 2000-2010.** D.A. Norton. 2000. *Threatened Species Recovery Plan 33*. 20 p. ([PDF, 304K \(opens in new window\)](#))

**Shrubby tororaro (*Muehlenbeckia astonii* Petrie) recovery plan 2000-2010.** P. de Lange; C. Jones. 2000. *Threatened Species Recovery Plan 31*. 24 p. (Out of print) ([PDF, 352K \(opens in new window\)](#))

***Pittosporum patulum* recovery plan, 1999-2009.** . Townsend 1999. *Threatened Species Recovery Plan 28*. 12 p. (Out of Print.) ([PDF, 599K \(opens in new window\)](#))

## **APPENDIX 2: GLOBAL STRATEGY FOR PLANT CONSERVATION (GSPC)**

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### **Objective I: Plant diversity is well understood, documented and recognised**

- Target 2: An assessment of the conservation status of all known plant species, as far as possible, to guide conservation action.
- Target 3: Information, research and associated outputs, and methods necessary to implement the Strategy developed and shared.

### **Objective II: Plant diversity is urgently and effectively conserved**

- Target 4: At least 15 per cent of each ecological region or vegetation type secured through effective management and/or restoration.
- Target 5: At least 75 per cent of the most important areas for plant diversity of each ecological region protected with effective management in place for conserving plants and their genetic diversity.
- Target 7: At least 75 per cent of known threatened plant species conserved in situ.
- Target 8: At least 75 per cent of threatened plant species in ex situ collections, preferably in the country of origin, and at least 20 per cent available for recovery and restoration programmes.
- Target 10: Effective management plans in place to prevent new biological invasions and to manage important areas for plant diversity that are invaded.

### **Objective III: Plant diversity is used in a sustainable and equitable manner**

- Target 11: No species of wild flora endangered by international trade.
- Target 12: All wild harvested plant-based products sourced sustainably.
- Target 13: Indigenous and local knowledge innovations and practices associated with plant resources maintained or increased, as appropriate, to support customary use, sustainable livelihoods, local food security and health care.

### **Objective IV: Education and awareness about plant diversity, its role in sustainable livelihoods and importance to all life on earth is promoted**

- Target 14: The importance of plant diversity and the need for its conservation incorporated into communication, education and public awareness programmes.

### **Objective V: The capacities and public engagement necessary to implement the Strategy have been developed**

- Target 15: The number of trained people working with appropriate facilities sufficient according to national needs, to achieve the targets of this Strategy.
- Target 16: Institutions, networks and partnerships for plant conservation established or strengthened at national, regional and international levels to achieve the targets of this Strategy.



## Threatened species Strategy:

#83

name:

[REDACTED]

email:

[REDACTED]

Date:

2017.07.30

1080 is being used far, far, far too liberally. It appears that this method is more to do with feathering the pockets of those in the business than actually choosing the best method for predator control. 1080 is far too indiscriminate. That 1080 can kill the very species it is trying to protect makes the process a tragic comedy. Ground trapping could easily be used in many places where helicopters are being used. A bounty should be reinstated. Just because there were issues with bounties in the past doesn't mean those issues can't be ironed out. That DOC will not revisit that option is a failure.

DOC appears to be in denial over the inhumane effects of 1080. It doesn't matter what species are involved, they all have a right to a humane death; 1080 is anathema to the right to die humanely.

That NZ becomes predator-free by 2050 (or when ever the goalpost is for) is a joke. Rats and humans are inseparable, wherever humans go, rats go, or follow. Yes there may be some few rat-habitable areas on the planet where rats have not established due to active monitoring, but as the years go by it is becoming harder and harder for those places to be rat-free, actually eradicating them from already established colonies around human areas I doubt can be achieved. The ecosystems introduced to NZ are now too complexly interwoven to ever unravel and set straight. Humans are also predators but there appears to be no intention to get rid of the humans.

I support GE Free NZ Tai Tokerau and its concerns about the use of transgenics/ Genetic engineering to try and combat feral pests.

**From:** [REDACTED]  
**Sent:** Sunday, 30 July 2017 1:16 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
Organisation:

Email: [REDACTED]

q1: No. It doesn't target all threatened and at risk species, and doesn't place enough stress on protecting and enhancing freshwater, marine and terrestrial ecosystems – not just individual species. Control of introduced species is one of the single biggest issues to be addressed but Predator Free NZ just doesn't cover all the bases. Apart from the omission of cats, mice, ferrets and weasels, control of introduced mammals makes very little mention of herbivores – pigs, deer, etc – which in some locations are the biggest threat facing native forests. Weed control also needs to be greatly expanded.

q2: Habitat loss needs to be addressed – neither put in the too-hard basket when it occurs on privately owned land; nor actively encouraged when DOC fails to oppose the loss of public conservation land for activities such as irrigation or mining.

q3: Yes. Though needs to be more emphasis on marine life and the threats which it faces.

q4: The main tools envisaged seem to be offloading the financial responsibility for carrying out action to the private sector, with the consequent insecurity of funding, and the need for DOC employees to spend as much time on establishing 'partnerships' as they do on actually carrying out conservation.

q5: Needs to be more legislative tools – and enforcement agencies – to protect threatened species and ecosystems, rather than a weakening of protection brought about, for example, by current plans to fast-track the consenting process.

q6: Goals need to be much more ambitious, and in any case are unlikely to be achieved if the Department of Conservation doesn't receive adequate funding.

q7:

q8: Need a 'whole of government' response.

q9:

q10:

q11: toofew

q11comments:

q12: Disappointing lack of focus on marine species.

q13:

q14: They may set a framework but the big picture will be seriously lacking unless a more comprehensive approach is taken.

q15:

**From:** [Redacted]  
**Sent:** Sunday, 30 July 2017 1:25 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [Redacted]  
Organisation:  
Email: [Redacted]

q1: No. This is not a vision but a cop out. DOC has a statutory role to protect our all our indigenous biodiversity with our at risk and threatened species the top priority. DOC needs to comply with New Zealand’s international obligations :-

To :- restore viable populations of all our threatened and at risk species across their natural range and maintain their genetic biodiversity.

In “Taonga of an island nation: Saving New Zealand's birds” the Parliamentary Commissioner for the Environment highlighted the plight of our native bird species. This report should be an embarrassment to DOC. The report did have a vision and should be adopted by DOC as their vision through to 2025 “The restoration of abundant, resilient and diverse species and habitats across their natural range.”

Aiming to protect just 20% of New Zealand’s threatened species is not acceptable as a goal. Bottom line should be that :-

1. All at risk and threatened species will be protected
2. And that all at risk and threatened species should be managed by DOC so that they are no longer at any risk of extinction in their natural habitat.

Introduced predators are a major risk vector to our indigenous biodiversity. The goal of predator free New Zealand by 2050 is aspirational but how this might be achieved is yet to be mapped out. There are still huge areas of the conservation estate which has had no predator control for many years. Limiting the target species to possums, rats and stoats will not achieve the goal of protecting all our at risk and threatened species. The list needs to include the other mustelid species weasel and ferret, feral cats, and mice. Feral pigs and deer are also a major threat to our forests and indigenous biodiversity.

q2: Additional aspects that should be included in the vision include :-

1. Promotion of areas along the coast for Marine Reserves and greater protection of our threatened marine species outside these reserves.
2. A program to undertake basic research on the ecosystems within our conservation estate. At present it seems that only when there is a development planned do we find out what is in a particular ecosystem, eg Denniston Plateau, and then such work has to be done by NGO’s.
3. Such work in point 2 above will allow better understanding of the complete ecosystem and where the threats are greatest for our at risk and threatened species.
4. Habitat loss. An example is the destruction of our braided river systems in Canterbury.

q3: Yes.

q4: The adoption of a National Policy Statement on Indigenous Biodiversity under the RMA is supported. It also needs to have provision for the protection of our threatened and at risk species on free hold land.

Whole ecosystems need to be protected and the natural vegetation is fundamental to these ecosystems, so the development of legislation to protect native threatened vegetation and whole habitats is urgently needed.

The goal should be to protect New Zealand's unique biodiversity within its natural habitat. The Parliamentary Commissioner for the Environment has pointed out that translocations are expensive and DOC already knows that the success rate is not high in many cases (<50%). Areas protected by predator proof fences are very expensive to install and maintain, and even with the best resources are not full proof, so should not be relied on as an ultimate method of protection. Captive protection should only be considered as a last resort and managed as a temporary solution until species can be relocated to their natural environment.

All our native diversity is important to New Zealanders and DOC should be advocating for our entire native biodiversity. We should not be prioritising management of the various at risk and threatened species. Specialist groups within DOC should manage these species, creating management plans, and being responsible for the implementation. The current regional structure in DOC is inhibiting the functioning of such groups.

q5: DOC is totally underfunded and as an organisation has lost sight of its primary function as the manager of our conservation land and native biodiversity. DOC is the Department of CONSERVATION not TOURISM. Adequate biodiversity funding is needed for DOC to fulfil its statutory requirements.

q6: There needs to be a system in place outlining how progress towards the goals are assessed and a schedule developed for open transparent reporting to New Zealanders.

As stated previously we have a lack of knowledge of the complex ecosystems within the conservation estate. The data deficiency needs to be addressed and an objective set for Goal 4.

We are dealing with our precious indigenous biodiversity and so the goals need to be much more ambitious. Aiming to protect just a proportion of our threatened and at risk species is just not good enough.

- q7: 1. A priority goal should be that no indigenous species should become more threatened than they are NOW.  
2. A further priority goal should be to stop any by kill of threatened species. Especially important in the marine environment.  
3. We need to know what is in our conservation estate, too many known unknowns. A goal should be to do biological ecosystem surveys of all conservation land at a rate on the order of 5% a year.

q8: DOC needs to provide leadership and advocacy within government, and hold other government agencies (MPI, MBIE, LINZ) to account for their environmental strategies.

When our plants and animal individuals get to very low numbers then there is potential for problems for the species from a reduced genetic pool. The strategy needs to address this issue so that species do not become genetically constrained.

q9: Yes.

q10: The Department of CONSERVATION should split off its tourism role to be administered by the Ministry of Tourism, so that its core role of CONSERVATION of indigenous biodiversity is the focus.

All conservation land should be under a predator control program.

Action 10. A transparent reporting system needs to be added so that New Zealanders can see the progress achieved towards the goals set.

Legislation needs to be developed to stop fisheries by catch of at risk and threatened species.

The list of predators targeted with Predator Free NZ should also include weasel, ferret, feral cat, mice, feral pigs and deer.

q11: toofew

q11comments: All our at risk and threatened species are important to New Zealanders. All need to be managed so that they maintain healthy populations into the future. Prioritisation because of lack of funding is unacceptable.  
q12: No.

All threatened and at risk species should be included with clear plans for recovery and enhancement in place by 2025

q13: Prioritisation for management should be based on the threat level for individual species not on the cost of management.

q14: The strategy and framework appear to have been written specifically for the current National Party led government, not for what is needed for maintenance and enhancement of New Zealand's indigenous biodiversity. Would these be the goals if the DOC biodiversity budget was tripled ??? The goals should be considerably more ambitious and reflect what is actually required to manage ALL our at risk and threatened species so they may flourish into the future.

Glaring omissions within the strategy are the lack of goals for marine ecosystems and specifically protection for our marine seabirds which suffer at the hands of the fishing industry. Similarly for our marine mammals. DOC needs to have a strategy to work with other government agencies such as MPI and MBIE to make sure they have a clear conservation focus with regards to our at risk and threatened species and hold them accountable for any lapses.

Similarly DOC needs to work with LINZ to make sure public land is protected so that our at risk and threatened species survive and flourish. The margins of the Canterbury braided river systems is a case in point. DOC is failing to be an advocate for our threatened and at risk species.

The vision has a focus on the current programs of :\_

1. Battle for our Birds.
2. War on Weeds
3. Predator Free NZ

Battle for our Birds program covers only a tiny proportion of the conservation estate. War on Weeds has a very limited scope in the number of weed species targeted. Predator Free NZ is a new vision and an aspirational goal, but no plan is in place to show how this might be achieved and where the leadership and resources will come from. The target species for the program is too limited. These are also very terrestrial programs and ignore the marine environment.

q15:

**From:** [REDACTED]  
**Sent:** Sunday, 30 July 2017 3:47 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
 Organisation:

Email: [REDACTED]

q1: No. It doesn't appear to get anywhere near close enough to the vision recommended by the Parliamentary Commissioner for the Environment's recent Report:

"The restoration of abundant, resilient and diverse species and habitats across their natural range."

q2: Yes. The vision should address:

- the need to halt the loss of habitats that support threatened species
- Increased emphasis on improving our knowledge of the threats to, and conservation status of, species.
- Actions for threatened marine species.

The vision is focused on land based threatened species and actions to assist them, yet there are large numbers of sea birds threatened with extinction as well as dolphins, whales, sealions, marine fish and invertebrates.

q3: I agree that biodiversity is very important (in fact integral to NZ life). The strategy should recognise the impact of commercial processes on threatened species, including farming intensification.

q4: No. The Strategy places too much emphasis on the need to prioritise the work between threatened species. This emphasis appears to be driven by the lack of resources, rather than conservation need. All threatened and conservation dependent species need to be managed for protection and there needs to be flexibility to be able to work on species that may not have been prioritised, but where an opportunity or a necessity arises.

q5: We need more resourcing for both DOC and science innovation to identify the threats and agents of decline and develop management prescriptions.

q6: The proposed goals need to be considerably more ambitious.

There are no goals to achieve enhancing all of our threatened and at risk species, or increasing knowledge about the many data deficient species so that no species are data deficient.

There is no goal setting out how progress will be assessed and publicly reported.

Goal 4 fails to set a target for assessing data deficient species

q7: Amend the goals to include:

- Enhance the populations of more than 50% of our threatened species so that they are on the road to recovery by 2025,
- Manage all threatened species requiring conservation intervention for protection so that no species should become more threatened
- All threatened and conservation dependent species should be actively managed for recovery by 2030.

- Reduce by kill of threatened species to ensure recovery to non threatened status
- Select 230 data deficient species every year so that by 2030 there are no data deficient species.

q8: The following additional themes should be included:

- Uniting all Government Agencies in an “all of government” response to threatened and at risk species to ensure all native species thrive.
- Maintaining genetic diversity and creating resilience

q9: With the additions below

q10: In addition to achieving the Predator Free 2025 goals and the Battle for our Birds response to masting events,

Increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control.

Develop a portfolio of priority areas for sustained and effective predator control beyond public conservation lands.

Amend Action 7 to; Develop and publish a portfolio of priority areas for threatened species protection on private land.

Amend Action 8 to select 1000 rather than 500 of the 3000 data deficient species for assessment.

Amend Action 9 to ensure that national recovery planning systems are not only fit for purpose but are also timely and implemented to achieve threatened species goals.

Add to Action 10 the development of a system for monitoring and regular public reporting on progress towards the goals.

Introduce regulations to achieve zero bycatch of threatened species in fisheries.

Expand the War on Weeds to include lupins, broom and willow on river beds and their margins

Add an action to identify and take opportunities to preferably purchase, or covenant habitats of threatened species.

q11: too few

q11 comments:

q12: No - all the threatened species and those that are at risk and conservation dependent should be prioritised for enhancement by 2030

q13: Prioritisation should be dependent upon threat status, with account taken of the imminence of threats and be less influenced by the cost of management.

q14:

The vision, and consequent framework only proposes to increase the populations of 150 out of 800 threatened species at risk of extinction, and manage 600 out of a further 2,200 species at risk of decline. The vast majority of threatened and at risk populations which need help now are not covered by the Strategy’s proposals for action.

The strategy focuses on terrestrial species, relying heavily on Predator Free NZ, Battle for our Birds and the limited War on weeds. There is a disappointing lack of focus on out shore and seabirds which are also facing significant threats or marine and freshwater species generally.

It fails to commit all government agencies to do their bit to meet the strategy’s goals, especially for marine species, or commit the government to ensure that all of the public conservation lands needing predator control are under regular sustained predator control, and that there are effective policies and actions to protect threatened species on private land.

q15:

**From:** [REDACTED]  
**Sent:** Sunday, 30 July 2017 4:02 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
Organisation: West Coast Penguin Trust  
Email: [REDACTED]

q1: DOC has demonstrated ambitious goals with ZIP/Predator Free 2050 and the "hairy audacious goals" of recent years, and the strategy needs to do the same - reach for the sky - what would you really like to do, what are your dreams for threatened species - that's what should be in the vision, and then the strategy directs work in that direction.

q2: As above, and, e.g. no further extinction of native species, ...

Make it a vision to be proud of and all those involved will be proud to work towards it.

q3: Current state is clearly presented, but the value of protecting threatened species is not adequately argued. If it were, more action and stronger goals would be included.

q4: The loss of recovery groups was of concern, but if their work can be continued and expanded through 'Natural Heritage Specialist Groups', that will not only be a good thing, but essential. We are keen to work with the relevant specialist group (penguins and seabirds).

Prioritisation has been years in the making and has created concern and delay around the country. Certainly it is important to prioritise with a limited budget and resources, but the outcome, a ridiculously small and limited list, which appears to have still included random elements, feels like a step backwards. It is essential that conservation management extends much further down the priority list.

Yes, we need to be open to captive management, or management in human care.

Reviewing sanctuaries and alternatives to fences is important, and the advent of self resetting traps may help, but working with others to develop alternative tools for predator control is critical. It's essential to embrace alternatives and support their development. It is also essential to reduce accidental by-kill caused by predator control to zero. Of course it is also essential to reduce by-kill caused by other activities, such as fishing, to zero. By-kill is not mentioned and should be addressed.

q5: Involve everyone. Your biodiversity intermediate objectives include local/community values. Have you incorporated those or even asked for them? Which species are important locally around the country? Are they included? You could have workshops in the regions to allow this information to be brought forward, while at the same time explaining the priorities and then finding a balance.

Anomalies need mentioning, like allowing whitebaiting and the sale of whitebait, including threatened fish species, or releasing trout that will thrive on a diet of threatened native fish. Yes, difficult topics, but yes they are relevant.

q6: Yes they will help, but they are not strong enough. Be brave. Set courageous (hairy audacious) goals. Include all threatened species.

There is only one 'data deficient' species of bird, but perhaps many insects and plants etc so perhaps goal 4 needs better explanation?

Goals should include working with others to improve predator control and reduce reliance on 1080 - and make it a SMART goal.

q7: Predator control is essential. Focus needs to be on finding an alternative to 1080, but also addressing the huge threat presented by dogs and cat.

Also being more determined and forceful when responding as affected parties or land managers when considering consents/concessions that will damage and/or destroy habitat. Speak up for conservation - that is what the Conservation Act requires of you. If waterways are being damaged and water quality reduced where you can have



an influence - through mining Access Arrangements (and compliance) or grazing concessions etc, get it right, take the necessary steps to enforce conditions.

q8: Be specific about finding new predator control tools.

Yes focus beyond PCL but get it right there first/as well. If you fail to manage environmental compliance and allow habitat to be damaged without permits and without consequences, you are failing in your role.

q9: Include developing/searching for an alternative to 1080.

Include a focus on reducing accidental by-kill to zero - no more dead native birds.

Include raising environmental compliance standards such that a future study by EDS finds that each element is raised from 'needs improvement' to 'excellent'.

q10: Stronger connection to universities and government research agencies to advance pest control and species management.

q11: too few

q11 comments: As noted above, have an ambitious goal and a greater number of priority species - all the priority species in fact.

q12: Review process for including species. It seems that a fairly random element of 'notable' has been included. Our Trust is currently working on establishing threats to Fiordland crested penguins - i.e. we are 'managing' the species, alongside penguin scientists from Otago University. This species is therefore 'managed' but on behalf of rather than by DOC. A similar situation exists for the yellow-eyed penguin that has been included. The latter has been included as being deemed 'notable' by DOC staff, but the tawaki (FCP) has not.

q13: Having spent years developing a threat priority list, that needs discussion with those working in conservation - scientists and community groups etc. Taking a random approach by a few to include 'notable' species, is not good enough.

q14: It's a good start, but not brave enough and not broad enough.

q15: I may have included some of these points already, but these are my notes from the draft strategy in one place:

- Bykill of non-target species as a result of predator control/1080 is mentioned but I would have thought that a determined effort to reduce that to zero should be included as a target; perhaps also working on alternative landscape scale solutions like stopping fertility of predators etc (p3 (s2), p19 and p40 (s2))
- Good to see mention of the cost to safeguard what we have being less than the cost to rescue what we're losing - p14
- There is reference to international obligations – and it sounds negative (p14) – would be better to see “we are committed to” – as in we must and we want to! (rather than "...oblige us to...").
- P17 – A call to action – should include community groups as partners
- Tawaki potentially fit into future Battle for our Birds operations, and, by extending just a little, can be linked in to pest control for kiwi, kaka, kea etc (p18), i.e. part of the focus on single areas with high diversity of threatened species (also p31)
- Kiwi projects will continue to receive investment to protect them (p18), and this could include conservation psychology/social science approaches to dog owner behaviour – worth mentioning for the value for other species, including penguins - something we are looking at and are keen to collaborate on this.
- P20 mentions 'Natural Heritage Specialist Groups' – our work on tawaki threats in South Westland puts us into this bracket I would think – how do we become or join one?
- P31 mentions kōkako – should be North Island kōkako!
- Box on p35 refers to science-based solutions to dealing with threats – this is how our Trust has always worked, but funding criteria can penalise this and need to be changed if they still apply – e.g. mentioning things like survey or research has resulted in applications being thrown out I understand
- P39 states that “DOC’s website will provide a list of species for which more info is required to determine their conservation status and inform their conservation management. Universities will be encouraged ....” It’s important that the tawaki appears on such a list to ensure continued work to understand and then manage threats.
- And finally, the tawaki, Fiordland crested penguin, Nationally Vulnerable, should be on the list of birds included in the 50 top species.

Please forward me a copy of this submission - thank you. [REDACTED]

# New Zealand's Threatened Species Strategy: submissions for consultation

#88

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
(if on behalf of an organisation)

Zoo and Aquarium Association New Zealand

Email:

Signature: Meg Rutledge

(we accept a typed signature if  
no electronic signature)

**Submission:**

**You can answer all or some of the questions.**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

*On the whole yes it does. There appears to be a diverse focus and we applaud the inclusion of a species list.*

2: Are there additional aspects that you think should be included in the vision?

*We think that the survival of species requires international links as well and that NZ could utilise these for better outcomes.*

3: Do you agree with the characterisation of the value and current state of our native species?

*Yes. The effort required is immense and all partners must be included.*

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

*We would like to see the section here titled “captive management” on page 20 changed to ‘A Partnership with the Zoos, Wildlife Parks and Aquariums to better reflect the MOU which is in place- similar to Botanic Gardens which is headed similarly on page 21*

5: Are there other tools we could use to help us achieve the vision?

*Yes the One Plan approach from the IUCN Conservation Planning Specialist Group should be considered. This approach is used globally by the Species Survival Commissions of the IUCN. CPSG has an office located at Auckland Zoo.*

6: Will the proposed goals help us achieve the vision and assess our progress?

*They will assist but DOC needs to utilise all partners and stakeholders according to their specialist skill sets. For Example ZAA members are specialists in husbandry, conservation breeding, species management (including genetic and demographic management of ex situ populations) etc. and this should be reflected in the strategy. It seems that breeding for restoration is still not seen as a major contributor to species survival and we would like this to be highlighted.*

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

*No*

8: Have we identified the right strategic themes?

Yes

9: Do you agree with our top 10 actions?

Yes

10: Are there any other actions that should be included, and any actions that should be removed?

*Advocacy for species protection- the whole community needs to understand the way they can help – it's not going to be all down to the scientists and government officials to save our species. New Zealanders need to be part of the conversation – zoos, wildlife parks and aquariums can help with this given that we see over 2million visitors each year in NZ*

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • *About right* • Too few

### **Comments:**

12: Have we identified the right priority species?

*At this time yes*

13: Do you think other species should be prioritised ahead of the ones listed? And why?

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

*Yes as long as the implementation phase is well organised and all players consulted. Working together in partnership pg 39 needs to go beyond community to those organisations which can add value to the science/ knowledge needed and undertake some actions required. This is especially true in the top 10 actions area.*

15: Do you have any further comments regarding the draft Strategy that is not covered above?

*ZAA members play a crucial role in connecting New Zealanders with their threatened native species and providing invaluable specialised care and scientific knowledge especially in managing ex situ populations.. We feel our members contribution and commitment to protecting our threatened species is not reflected in the current strategy.*

*Please ensure the name of our organisation is correct in the strategy – within the space of a paragraph it is two different things – it should be the Zoo and Aquarium Association Australasia (ZAA).*

*Ideally the section currently under ‘Captive Management’ should read:*

DOC and the Zoo and Aquarium Association (ZAA), Australasia, have a Memorandum of Agreement to pursue and deliver on threatened species conservation and advocacy, particularly through visitor engagement and quality animal welfare. The MOU affirms the commitment of both organisations to enhancing and strengthening outcomes for New Zealand’s native fauna.

Members of ZAA are experts in captive management and are able to support threatened species recovery through captive breeding, captive rearing (e.g. ‘wild head-start’ programmes such as Operation Nest Egg for kiwi), and supporting reintroduction and restoration through well managed breed and release to the wild programmes. ZAA has the capacity to provide international best practice small population management advice (both genetic and demographic) and annual reports for DOC/ZAA agreed species recovery programmes. ZAA captive coordinators are members of a number of DOC recovery advisory groups.

Well managed captive programmes are able to support restoration (to the wild/sanctuaries) and supplementation of wild populations through the release of captive bred individuals. Rearing of threatened species is a highly-specialised field, as are the facilities and expertise in animal husbandry, welfare and small population management that it requires.

*We also feel that an area that has not been addressed is the role of veterinary science and veterinary research in understanding the issues occurring in the environment. This is a major contributor to species survival, science and knowledge base pg 35 and can assist with DOC research and understanding of strategic priority interventions.*

*For example sea bird cases, lead toxicity cases, parrot veterinary cases. Furthermore, the research being conducted by ZAA member organisations on behavioural ecology, reproductive biology, and breed-for-release/translocation strategies has been essential to a number of invertebrates, reptiles, and avian fauna across New Zealand in informing species recovery, translocation, and breed-for-release strategies.*

# New Zealand's Threatened Species Strategy: submissions for consultation

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## Submissions must be received no later than 5pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Organisation name:  
(if on behalf of an organisation)

Email:

Signature:

(we accept a typed signature if  
no electronic signature)

### Submission:

You can answer all or some of the questions.

- **Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

**No** - only aiming to protect 20% of threatened and at risk species by 2030 is a poor target:

**All threatened and at risk species must be protected**

**The vision for Predator Free NZ by 2050** – is supported but needs to be expanded to include the other key introduced predators, especially mice, ferrets, weasels and feral cats.

**“Battle for our Birds” is supported** but needs to be expanded so that all of the public conservation land needing predator control is under regular **cost effective** sustained predator control.

The **“War on Weeds”** also needs to be expanded from the dirty dozen as this is less than 4% of the 350 weeds which currently threaten nature. Weeds such as lupin and

broom are a serious threat to birds nesting on braided rivers.

## 2. Are there additional aspects that you think should be included in the vision?

*The vision should address:*

- *the need to halt the loss of habitats that support threatened species*
- *Actions for threatened marine species.*

*The vision is focused on land based threatened species and actions to assist them, yet there are large numbers of sea birds threatened with extinction as well as dolphins, whales, sealions, marine fish and invertebrates.*

*The vision and actions of the Strategy need to incorporate an all-of-government approach to protecting threatened and at risk native species. The actions (or lack of action) of many government agencies **including the Department of Conservation**, have significant impacts on our threatened species. All government agencies should have a responsibility under the Strategy to ensure that their policies and actions support the restoration of threatened and at risk species.*

- **Do you agree with the characterisation of the value and current state of our native species?**

**Yes Agree with the value of our biodiversity.**

*The Trouble in Paradise section of the strategy needs to recognise the impact of the commercial harvest of threatened species, such as **whitebait species, Long finned eels and seaweed**, as well as the continued clearance of habitats of threatened species for commercial development such as farming intensification, urban expansion and infrastructure such as motorways.*

*The state of our species section needs to be more specific so that it is clear that for example what percentage of our birds, or reptiles, or native plants are threatened, and what the trends are for each group of species.*

- **Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

*~ The Strategy needs to require that all critically threatened species that would benefit from detailed management plans also have dedicated recovery groups that oversee the production and implementation of those plans.*

*~ The Strategy places too much emphasis on the need to prioritise the work between threatened species. This emphasis appears to be driven by the lack of resources, rather than conservation need. All threatened and conservation dependent species need to be managed for protection and there needs to be flexibility to be able to work on species that may not have been prioritised, but where an opportunity or a necessity arises.*

*~ Captive management should only ever be a last resort tool, as the priority for threatened species must be conservation in situ.*

*~ While Fenced sanctuaries serve a useful purpose, they should not be prioritised over conservation of threatened species in situ.*

*~ As the Parliamentary Commissioner for the Environment's recent report notes, translocations are expensive and risky and should be evaluated against the overall benefit of the species and against the benefit of using the same resources to control predators, or to provide other assistance in the in situ restoration of threatened species.*

*~ The development of native threatened plant and habitat protection legislation is supported..*

*~ Support the adoption of a comprehensive National Policy Statement on Indigenous Biodiversity under the RMA.*

*~ Support greater use of legislation, regulation and policies to ensure that human actions do not further threaten species, for example zero bycatch of threatened species in the fishing industry; no clearance of threatened species habitats.*

*~ Development of a National Policy Statement on indigenous biodiversity is supported provided it sets bottom lines for biodiversity protection on private land, that will achieve the vision and the goals needed to protect and enhance all our Threatened and At Risk native species and prevent others becoming threatened.*

- **Are there other tools we could use to help us achieve the vision?**

*The best possible tool is to ensure that the Department of Conservation is **adequately funded** to undertake all the steps necessary to restore all species at risk of extinction and to prevent others from becoming threatened.*

*The government needs to also adequately resource science to identify the threats and agents of decline and develop management prescriptions*

*Tools and resources are needed to ensure the monitoring and enforcement of existing legislation, policies and regulations at the central and regional and local government levels.*

*Utilise the Crown's tenure review process to secure high country threatened species habitats and ecosystems in Crown ownership and control.*

*Greater use of DOC's advocacy functions under resource management and other legislation to halt the decline of our biodiversity and enhance threatened species and their habitats.*

*Regulations are needed to require appropriate bycatch mitigation techniques, and transition to modern, low impact, fishing techniques.*

*The war on weeds needs to be expanded from just 13 of the 350 weeds known to be harmful to nature.*

- **Will the proposed goals help us achieve the vision and assess our progress?**

**The proposed goals need to be considerably more ambitious.**

*There are no goals to achieve enhancing all of our threatened and at risk species, or*



*increasing knowledge about the many data deficient species so that no species are data deficient.*

*There is no goal setting out how progress will be assessed and publicly reported.*

*Goal 4 fails to set a target for assessing data deficient species*

- **Are there alternative goals that you think will better achieve the vision and assess our progress?**

Amend the goals to include:

- *Enhance the populations of more than 50% of our threatened species so that they are on the road to recovery by 2025,*
- *Manage all threatened species requiring conservation intervention for protection so that no species should become more threatened*
- *All threatened and conservation dependent species should be actively managed for recovery by 2030.*
- *Reduce by-kill of threatened species to ensure recovery to non threatened status*
- *Select 230 data deficient species every year so that by 2030 there are no data deficient species.*

- **Have we identified the right strategic themes?**

The following additional themes should be included:

- *Uniting all Government Agencies in an “all of government” response to threatened and at risk species to ensure all native species thrive.*
- *Maintaining genetic diversity and creating resilience*

- **Do you agree with our top 10 actions? -**

*Yes with additions and amendments, as set out below.*

**1. Are there any other actions that should be included, and any actions that should be removed?**

*In addition to achieving the Predator Free 2025 goals and the Battle for our Birds response to masting events:*

*~ Increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control.*

*~ Develop a portfolio of priority areas for sustained and effective predator control beyond public conservation lands.*

*~ Amend Action 7 to: Develop and publish a portfolio of priority areas for threatened*

*species protection on private land.*

*~ Amend Action 8 to select 1000 rather than 500 of the 3000 data deficient species for assessment.*

*~ Amend Action 9 to ensure that national recovery planning systems are not only fit for purpose but are also timely and implemented to achieve threatened species goals.*

*~ Add to Action 10 the development of a system for monitoring and regular public reporting on progress towards the goals.*

*~ Introduce regulations to achieve zero bycatch of threatened species in fisheries.*

*~ Expand the War on Weeds to include lupins, broom and willow on river beds and their margins*

*~ Add an action to identify and take opportunities to preferably purchase, or covenant habitats of threatened species.*

- **Have we identified the right number of priority species?**  
(Circle or highlight one)      • Too many      • About right      • **Too few**

**Comments:**

*The number of threatened species identified needs to be driven by what is actually required to safe guard our threatened species and ensure that their populations are resilient and thriving rather than fitting the prioritisation to the current lack funding.*

- **Have we identified the right priority species? No**  
*All the threatened species and those that are at risk and conservation dependent should be prioritised for enhancement by 2030*
- **Do you think other species should be prioritised ahead of the ones listed? And why?**  
*Prioritisation should be dependent upon threat status, with account taken of the imminence of threats and be less influenced by the cost of management.*
- **Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

*The overall framework is seriously lacking in ambition.*

*The vision, and consequent framework only proposes to increase the populations of 150 out of 800 threatened species at risk of extinction, and manage 600 out of a further 2,200 species at risk of decline. The vast majority of threatened and at risk populations which need help now are not covered by the Strategy's proposals for action.*

*The strategy focuses on terrestrial species, relying heavily on Predator Free NZ, Battle for our Birds and the limited War on Weeds. There is a disappointing lack of focus on our shore and seabirds which are also facing significant threats; or marine and freshwater species generally.*

*It fails to commit all government agencies to do their bit to meet the strategy's goals, especially for marine species, or commit the government to ensure that all of the public conservation lands needing predator control are under regular sustained predator control, and that there are effective policies and actions to protect threatened species on private land.*

# New Zealand's Threatened Species Strategy: submissions for consultation

**Once you have completed this form**

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

**Submissions must be received no later than 5 pm Monday 31 July 2017**

Anyone may make a submission, either as an individual or on behalf of an organisation.

**Submitter details:**

Name of submitter or contact person:	[Redacted]
Organisation name: (if on behalf of an organisation)	
Email:	[Redacted]
Signature:	[Redacted]

*(we accept a typed signature if no electronic signature)*

## Submission:

### You can answer all or some of the questions.

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

The Vision encapsulates many of the important principles for NZ threatened species, but it is very strongly focused on terrestrial organisms and mechanisms/communities with terrestrial interests (e.g. "landowners"). While it is critically important to protect the biota occupying our freshwater & terrestrial habitats, the NZ region has many more times marine area than land, and the Vision is silent about this as well as about the need to engage with the communities of interest and those having greatest impacts in the marine area.

It is very important to acknowledge that achieving the intent of the Strategy will require strong partnerships with iwi exercising their role as kaitiaki, in addition to the key role that DOC plays. All NZers need to be engaged for this Strategy to succeed.

2: Are there additional aspects that you think should be included in the vision?

More explicit recognition of aquatic organisms both marine & freshwater, and with respect to marine species. Also, note that marine species are more than just marine mammals and seabirds, and the occasional charismatic fauna like corals.

3: Do you agree with the characterisation of the value and current state of our native species?

The lack of references to marine species is a significant oversight both with respect to value and current state.

The statements of value in relation to terrestrial & freshwater species are reasonable but the characterisation of the state of freshwater biota is insufficiently clear. NZ freshwater taxa are disproportionately represented in the at-risk and nationally threatened categories. It would be helpful to note the lack of success with recovery programmes in freshwater systems/freshwater taxa.

There is a great deal of community concern about the state of freshwater in NZ – and these at risk/threatened freshwater taxa are seen by some as the “canaries in the mine”. Are the declining fortunes of NZ’s freshwater biota a result of way in which conservation issues are being tackled? It is very clear that there are serious issues facing the protection of these organisms. And the habitats which they occupy.

There is no recognition of the role and value of microorganisms in this strategy, and the need to protect habitats in order to achieve their protection.

The use of “plants, animals and fungi” is puzzling as these three terms exclude a number of other organisms e.g. no mention of algae (micro or macro) which in turn belong to a number of different

phyla. For inclusiveness, it would have been preferable to use the term biota throughout unless explicitly referring to particular organism groups.

The tools are very focused on terrestrial biota, and marine examples are only covered under the section Regulation. Marine organisms are also affected by Biosecurity threats, and there are possibilities for Translocation attempts, Recovery plans, etc.

There is insufficient attention made to the development of tools and measures to protect native biota from introduced species/pests. While 1080 is an important tool, the use of this does not address all the critical issues, such as those facing species affected by invasive plants, or introduced diseases.

There is a need for further research on tools that encompass organisms in other habitat types (freshwater, marine) and facing specific types of threats.

## 5: Are there other tools we could use to help us achieve the vision?

Given the state of knowledge of marine organisms and the continued discovery of diversity, it seems that the protection of habitats and small natural features (SNFs) (e.g. Lundquist et al. 2017) may yield better outcomes for protection of diversity and consequently species.

For groups of organisms which predominate in the data deficient categories there is a need to reconsider how protection can be best achieved while species-specific knowledge is being built.

There is a need to look for new ways to protect freshwater systems including lakes and catchments – and particularly protection from invasive plants, invasive fish, etc.

[Lundquist, C., Bulmer, R.H., Clark, M.R., Hillman, J.R., Nelson, W.A., Norrie, C.R., Rowden, A.A., Tracey, D.M., Hewitt, J.E. 2017. Challenges for the conservation of marine small natural features. *Biological Conservation* <http://dx.doi.org/10.1016/j.biocon.2016.12.027>]

## 6: Will the proposed goals help us achieve the vision and assess our progress?

Assessment of progress assumes we understand our biota, and yet there are significant gaps in the documentation of the biota, and diminishing support for the underpinning taxonomic research and taxonomic experts, for the natural history collections (housed in CRIs and Museums), and for interoperable databases that will link experts, and data on our biota.

Unless we make progress on documenting our biota, including the species present and their phylogenetic relationships, as well as their distribution in space and time, evaluation of progress towards our goals will be incomplete – and reporting on the status of species will be seriously inadequate.

## 7: Are there alternative goals that you think will better achieve the vision and assess our progress?

Neither goal 1 nor goal 2 includes marine focus, and in regard to goal 4, there is no marine focused National Science Challenge that addresses biodiversity and threatened species, and no additional funding going to address the many 1000s of data deficient species in the marine environment.

#### 8: Have we identified the right strategic themes?

Focused on terrestrial examples.

#### 9: Do you agree with our top 10 actions?

1-3. largely exclude marine & freshwater

4. yes support this

5. support – make sure the Indigenous Biodiversity Collaborative Group actually includes representation of aquatic systems and organisms

6-10. support

#### 10: Are there any other actions that should be included, and any actions that should be removed?

Recognition of connectivity in aquatic environments is important – whether it be in relation to supporting fish passage and migratory species, or whether it is making the clear the consequences of activities up catchment on the habitats and organisms down catchment and through to estuaries and coasts.

Eels are both threatened and also subject to harvest – and there needs to be attention paid to this situation and protection for eels addressed.

#### 11: Have we identified the right number of priority species?

- About right

#### 12: Have we identified the right priority species?

Whilst I recognise that developing a decision-making process to identify which species warrant priority status is going to be challenging, it seems that the focus on conservation dependant taxa has skewed the list away from plants and from freshwater taxa.

#### 13: Do you think other species should be prioritised ahead of the ones listed? And why?

#### 14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

This Strategy is an important development for the protection of vulnerable threatened species. However, I think that the approach to marine and aquatic taxa needs to be reconsidered. At present

the scope of the Strategy is not sufficiently encompassing to address the needs of NZ's biodiversity across all domains.

15: Do you have any further comments regarding the draft Strategy that is not covered above?





**From:** [REDACTED]  
**Sent:** Sunday, 30 July 2017 9:02 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Name:** [REDACTED]  
**Organisation:**

**Email:** [REDACTED]

q1: It certainly does not. Why is it not including all of the threatened species in NZ instead of only 150.

q2: 1. The remaining 650 threatened species 2. Properly resourcing the Department of Conservation in order that they may tackle this issue.

q3: Well I certainly agree with the value of our biodiversity

q4: Prioritising species suggests that the department is taking a "god-like" role in deciding which species to save. This is pathetic. All threatened species should have a strategy.

q5: A realistic budget for starters would be a big help.

q6: No - far too limited. You aren't going to get a second chance with many species if you think too small.

q7: How about a goal of 80% of our species on the road to recovery by 2025

q8: A coordinated response from all government agencies and departments.

q9: largely

q10: - but add an action to acquire or covenant habitats of threatened species.

q11: too few


q11 comments: You won't get a second chance if you don't adequately resource this

q12: No - too limited by far

q13: Is cost the factor that has determined the species getting top priority?

q14: Too limited, unambitious and short-sighted.

q15: A complete re-draft please



Submission to the Draft Threatened Species Strategy consultation.

#### Use of 1080 Poison

The use of 1080 for pest eradication in New Zealand is a contentious issue between government departments and the people of this country. There appears to be no regard for the peoples' opinion and even less regard for consultation processes that have tabled expert opinion as to the risks involved in the use of 1080 to our native wildlife and the possibility of human health issues.

The following excerpt from a document titled, 4.1 Key facts, "*The use of 1080 for pest control*" from the Department of Conservation website (document now archived and not subject to updates), provides historic background information on 1080's use in New Zealand.

"1080 has been used in New Zealand for pest control since the mid-1950s and is the only poison registered for aerial application. 1080 was first registered as a pesticide for control of vertebrate pests in 1964, under the now repealed Pesticides Act. Its toxicity was well recognised at that time and hence it was classified as a "controlled pesticide", which means that 1080 is available only to licensed operators." (Department of Conservation, n.d.) At this point in time, the government is the licensed operator.

Surely, if there is a recognition of the toxicity of the chemical, there is reason to stop and investigate. Unfortunately, the only precaution that is indicated here is to classify rather than quantify.

The following excerpt from a document titled, 4.2 The life cycle of 1080, "*The use of 1080 for pest control*" from the Department of Conservation website (document now archived and not subject to updates), indicating the four separate stages of the 1080 life cycle and the considered risks.

"The 1080 life cycle can be broken down into roughly four separate stages:  
(Can I point out the use of loose language when addressing an issue that is so contentious in the public opinion, both at the time this document was current and presently.)

- Manufacture of 1080 products. Risks at this stage are to people involved in the manufacturing activities.
- Transportation and preparation for use of 1080 baits and products in the field. Associated risks are again mostly to people, although transport accidents could pose risks to the environment.
- Application - 1080 may be applied either aerially or using ground-based application methods. Both target and non-target species may be affected by the application of 1080, and secondary poisoning can occur if possum carcasses containing 1080 are eaten.
- Disposal of surplus or waste bait and containers." (Department of Conservation, n.d.)

The same document, section 4.4 Controls on the use of 1080, establishes the controls over use and indicates the extent of government department involvement.

“The VPC Regulations set out in detail the restrictions on places and methods of application of 1080. These define the circumstances when written permission is required from the appropriate authority for any use of 1080, the approvals required for aerial operations, and the requirements for public notification of 1080 operations. In particular, permission is required from the Medical Officer of Health for all aerial applications of 1080, for all operations on land to which the public has access, and for operations in proximity to water supply catchments. Regional or unitary authorities may also require a resource consent for 1080 operations, depending on how and where it is being applied.” (Department of Conservation, n.d.)

The core concerns of the people today fall into two areas:

1. Risks to our native animal, bird life, traditional hunting animals, domestic animals and farm livestock.
2. Potential risk of 1080 to humans

1. Risks to our native animal/birdlife, traditional hunting animals, domestic animals and farm livestock

#### Native animal/birdlife

Currently there are 2,788 species endangered with extinction in New Zealand. According to the Natural Heritage site, there are a further 3,031 believed to be endangered. (The Natural Heritage Collection, New Zealand, 2008 - 2012)

One of our peoples’ deep concerns is the risk to our native birdlife, e.g. the kiwi. The kiwi is considered our national emblem by the population and is one of those endangered species counted in the statistics above.

One of the issues that compounds the challenge by people to the authorities that continue to allow the use of 1080 in our natural environment, is the practice of not testing the native animal/birdlife found dead in those areas for 1080 poisoning. Instead, the effort is applied to convince the population that it was anything else but 1080. A complete independent scientific approach would be conducive to a resolution of these issues and I would ask that you incorporate it in the Threatened Species Strategy as a control factor.

One example of the practice ‘not to test’ can be found at the following news link.

<https://www.infonews.co.nz/news.cfm?id=77162> (James, 2011) There are literally hundreds of examples reported by reputable news sites where the 1080 confrontation tends to be disputed. Far too many to be reported here. Please view the link.

Another issue that compounds the tension between authority and general public is access to reliable official information, most information being gleaned from media reports. However, under an Official Information Act request by the New Zealand Herald, this information, which clearly justifies the general public’s concerns, was released. Our endangered Kea are being affected by 1080 poisoning. Under this information release, 24 Kea are confirmed poisoned by 1080.

[http://www.nzherald.co.nz/animals-pets/news/article.cfm?c\\_id=500834&objectid=11749165](http://www.nzherald.co.nz/animals-pets/news/article.cfm?c_id=500834&objectid=11749165) (Plumb, 2016)

## Domestic animals

Our domestic animals are also at risk from 1080 poisoning of the environment, both direct and secondary as is reported in this article.

<http://www.stuff.co.nz/auckland/72573428/Dog-dies-after-swallowing-1080-vet> (Stuff.co.nz, 2015)

## Farm livestock

This issue is truly contentious. One of New Zealand's primary industries is farming. This is where 1080 could potentially enter the food chain. The following You Tube NZ clip offers some damning evidence that is apparently well documented and equally as well ignored by the authorities.

[https://www.youtube.com/watch?v=kWFzmoVJ\\_Q4](https://www.youtube.com/watch?v=kWFzmoVJ_Q4) (1080science, 2014)

Then there is the graphic pictorial evidence of the lethal cruelty of 1080 poisoning as it indiscriminately kills untargeted animals. Yet there seems to be very little compassion shown by the authority to this indiscriminate side effect of the activity.

<https://www.youtube.com/watch?v=u7RFiz4lShA&feature=youtu.be> (TheGrafBoys, 2012)

## 2. Potential risk of 1080 to humans

While the general public's concern in the application of 1080 for pest control highlighted the risks for animal and bird life, initially, there is a growing awareness of the potential risk to humans. There was a report written in 2012 by Chris Mercer (cannedlion) that has raised some very serious questions. The five major points of the report could even be found on our ex- Prime Ministers Facebook site, John Keys World Yo,

<https://www.facebook.com/JohnKeysWorldYo/posts/421776997953726>

In the report, under the heading, 'The facts about compound 1080,' there are five points that Chris imparts. He states ,

1. The FBI in USA has issued a Terror Alert on this substance. One teaspoon can kill up to a hundred people; it looks like castor sugar and is easily soluble in water. It is tasteless, and there is no antidote. Apart from the Nazi experiments, at least 13 humans have been killed by Compound 1080 accidents and use as a murder weapon. Three children were killed in an Oklahoma City incident in which Compound 1080 was spread on vanilla wafers. In fact, it is the perfect murder weapon, virtually undetectable in a third world environment and killing with certainty, leaving a corpse with a probable post-mortem diagnosis of 'Heart Attack' as the cause of death. The presence of this poison in SA in an age of inter-societal tensions and terrorism is a threat to national security. One tablespoon could wipe out all of Parliament." (Mercer, 2012) The other four points are equally as frightening.
2. The poison was developed by the Nazis, tested horrifyingly on Jews and dissidents, and then rejected for Death Camp use because it was too dangerous for death camp staff to handle.
3. It was banned for general use in USA in 1972, after a number of human deaths and the wiping out of non-targeted species in coyote control. A former USA Environmental

Protection Agency Administrator described 1080 as 'one of the most dangerous toxins known to man.'

4. Death by 1080 is exceptionally painful and lingering, taking many hours and even days of spasms and convulsions before death from respiratory or cardiac failure.
5. Farm workers exposed to 1080 over a period of time can suffer extreme pain and disability merely by contact with the poison – even if they do not ingest.

On a site from the US, the FBI alert is reported on the Project Coyote, Fostering Coexistence, the alert reads, "... that after 9/11 the FBI listed sodium fluoroacetate as "a highly toxic pesticide judged most likely to be used by terrorists or for malicious intent." According to the FBI, the main criteria for a poison being added to the list are "high dermal or inhalation toxicity, common malicious use reported, and prior use by terrorists." The FBI, the EPA, and the World Health Organization classify Compound 1080 as an "extremely hazardous toxic pesticide." (Fox, n.d.) This supports Chris Mercer's claim in his report.

What really is the problem here for New Zealand?

The problem is the mounting evidence against the Department of Conservation's claims that 1080 is the best approach to predator control. The evidence delivered by other people who are equally as conservation conscious as our authorities claim to be, indicates confirmation of international presentation of the poison that creates great concern among the people of New Zealand.

The problem is the department's resistance to testing carcasses of untargeted animals and birds for 1080 therefore avoiding accountability.

The problem is ongoing weather events such as the events of the 22/23<sup>rd</sup> July 2017, in the South Island so soon after huge 1080 drops, washing carcasses into areas that are populated, highlighting the danger of secondary poison to both domestic animals and public water. The resistance to test those carcasses for 1080 if only to alleviate the public's concern, is baffling and calls both the department's assurances and science into question.

What would be a reasonable solution here? I believe that all 1080 use should be halted until independent, domestic and international, science has been investigated by an independent authoritative body outside of the present authorities. Recommendations that are forwarded from this body should be made public in a timely manner and open for consultation by the public that actually fund this activity.

In an article by Henry Cooke, Stuff. Co, July 25, 2017, Boris Johnson is clearly heard saying, "campaign of slaughter." Some argue that this is dark sarcasm but I would also like to point out that it could be considered a timely 'Freudian Slip.'

<https://www.stuff.co.nz/national/politics/95099169/boris-johnson-admires-tuatara-compares-takahes-evolutionary-wing-loss-to-nuclear-disarmament>

Do you know how stressful this issue is to your people??? Yesterday a lady passed who could not tolerate the poison that your department delivers, endangering her animals, anymore!!! Such was her love of animals and environment something you do not acknowledge or have... I doubt that you would ever understand that... And that is where the division between Government departments and the people lie!!!!

Kind regards



# Submission on New Zealand's Draft Threatened Species Strategy:

**Submitter details:**

Name of contact person:	[REDACTED]
Organisation name:	Wellington Botanical Society
Email:	[REDACTED]
Signature: Bev Abbott	<i>(we accept a typed signature if no electronic signature)</i>

## INTRODUCTION: THREATENED SPECIES STRATEGY SUBMISSION:

1. The Wellington Botanical Society is pleased to comment on the Draft Threatened Species Strategy (DTSS). Our primary interest and expertise is in New Zealand’s indigenous terrestrial flora.

### Low priority to saving threatened plants

2. The DTSS does a very poor job of explaining what DOC intends to do to protect New Zealand’s threatened and at-risk vascular plant species and their habitats. We hope the final TSS will provide more information about Government’s plans to protect New Zealand’s threatened and at-risk plants in the short to medium term.
3. We estimate there are 927 species of threatened and at risk vascular plants. This figure is based on the report from DOC and Statistics NZ in 2015 that 39% of the 2,378 species of indigenous vascular plants are threatened or at risk. The split between ‘threatened’ and ‘at risk’ appears to be about 250 ‘threatened’ and 677 ‘at risk’. We would welcome clarification of these statistics in the TSS.
4. There are only 39 plants on the list of 150 species for population enhancement under Goal 2. The following table shows this is a very low proportion compared with birds and other vertebrates.

Number of species	Vascular plants	Birds	Other vertebrates
No of species on list of 150 priority species	39	39	37
No of threatened species in taxa (from p12)	289	71	73
No of species on list of 150 as a percentage of the no. of threatened species in taxa	13.5%	55%	51%
Remaining no. of threatened species	250	32	36

5. The list of 50 ‘notable’ species contains 41 vertebrates, (mostly birds), leaving just nine places for ‘notable’ non-vertebrates such as plants, fungi and invertebrates.
6. There are only five species of plants on the “notable” list. These are alleged to be “important to people” but the DTSS does not explain how they were identified. Our submission recommends replacing the Chatham Island Forget-me-not with pīngao if both can’t be included.
7. The Spotlights add value to the DTSS but we were disappointed to find only one story about a threatened plant, (kākābeak).
8. Some of the remaining 250 species of threatened vascular plants may be included in the 375 species (all taxa), currently under management, or in the 40% increase (to 500 species) to be managed under Goal 1 by 2025, or in the 600 taxa to be managed by 2030. Goal 1 is not measurable; it just commits to “managing” species, presumably under EMUs, and says nothing about how future mixes of species will be determined.

### Relationship with EMUs

9. The link between Goal 1 (managing species), and DOC’s EMU system is not clear. Nor is the relationship between EMUs and places where rats, stoats and possums will be controlled under landscape scale Predator Free 2025 and the Battle for the Birds. Text on page 28 claims that the increases in the number of species that can be managed is one of the expected results of Predator Free 2050 and the War on Weeds. We’re yet to see any evidence or modelling to support this.



10. We want to know which of the 39 priority plant species are benefitting from being in an EMU, and which are on public conservation land but not within an EMU. Please explain how the latter will be managed. If their survival in the wild is beyond DOC's resources, some of these species may only survive if planted in ex-situ settings like private gardens, botanic gardens, fenced sanctuaries and off-shore islands. We hope the NZ Government never has to tell New Zealanders and international audiences that "we've given up trying to save the following plant species in the wild".

### **Relationship to NZ Biodiversity Action Plan 2016-2020**

11. In September 2016, the Government approved an ambitious target for threatened species conservation in New Zealand's Biodiversity Action Plan (BAP) 2016-2020. Target 12 says: "By 2020, the extinction of known threatened species has been prevented, and the conservation status, particularly of those most in decline, has been improved and sustained." Barely eight months later, the Government is proposing to enhance the populations of only 150 threatened species, and manage 500 others within the next seven years. We would welcome an explanation in the Minister's introduction of the reasons for this change in Government's aspirations.

### **Strategy for DOC or Whole of Government?**

12. It's not clear whether the TSS is intended to be a "Whole of Government" strategy or a strategy for the Department of Conservation. The Minister's introduction says "The draft TSS is the Government's plan ...", but then describes what DOC is going to do with support from mostly non-Government partners. (Only four other government agencies were mentioned). Finally, the Top 10 Actions revert to describing work underway in other Government ministries and agencies but it doesn't name them. The Top 10 Actions create the impression that DOC is going to do all these things as well as all the other work described in the TSS, and the Minister of Conservation is responsible for all of it.
13. We see some advantages in a "Whole of (central) Government" Threatened Species Strategy sitting under the umbrella Biodiversity Action Plan 2016-2020, by describing the key contributions of other ministries and agencies to the TSS goals, and which ministry/agency is on lead. It may also facilitate a more unified approach to compliance and enforcement, including prosecutions.
14. If, however, the TSS is a strategy for DOC, the Top 10 Actions should present a realistic summary of what DOC can deliver with its current biodiversity funding. The Brief for the Incoming Minister is the place for informing Cabinet and the public of how many more of New Zealand's threatened species and their habitats could be protected with an additional \$100 million over the next four years.

### **Social context**

15. The DTSS pays insufficient attention to the social context of DTSS implementation. The Survey of New Zealanders 2016 reported that only one in ten New Zealanders (12%) actively helped on a conservation project, the same levels as in 2014 and 2015, i.e. there has been no measurable improvement despite three years of DOC saying it can't do it alone. The researchers recommended that DOC include a focus on 'local' aspects in its messaging.
16. There's very little about the local dimension in the DTSS. Conservation management strategies include objectives for the management of named local threatened species which have been through a public consultation process. Partnerships with Post Settlement Government Entities and iwi are

developing. How will a national directive from Wellington listing the priority species to be enhanced and managed be received by iwi and PSGEs given the enhanced statutory decision-making rights they have recently gained as a result of Treaty settlements?

17. DOC is probably overly optimistic (p.32) in hoping that all volunteers and partners will unite under one vision and work together to eradicate a small number of terrestrial pests. Several tools are contentious (e.g. toxins, genetic management). Disagreements about the rights of landowners have delayed completion of the National Policy Statement for Indigenous Biodiversity for many years. Some past and potential volunteers are becoming demoralised as they see compliance agencies cut funding for monitoring and the enforcement of conservation management plans, concession conditions, resource consents, and regional and district plans etc, while these same agencies pursue economic and populist agendas. The recent changes to the Legal Assistance Fund may result in more volunteers deciding to redirect time money and knowledge to support NGO legal challenges instead of supporting practical conservation partnerships.

### **Unintended consequences**

18. Knowing that DOC does not intend to protect particular threatened and at-risk plant species may have unanticipated consequences, e.g., individuals may decide it's up to them to save these species, by, for example, collecting seedlings, seeds, spores, or cuttings for propagation in private gardens or restoration projects without obtaining permits.

### **Finally**

19. The balance of this submission considers the questions on DOC's Submission Form.

## PART I: ANSWERS TO QUESTIONS ON SUBMISSION FORM

### 1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

Is the Vision made up of all three paragraphs? Vision statements are usually short, motivational and memorable.

We recommend basing the vision on the statement in the Biodiversity Action Plan 2016-2020, (BAP): “By 2025, the extinction of known threatened species has been prevented, and the conservation status, particularly of those most in decline, has been sustained or improved.”

An alternative would be to combine the two key goals and the definitions of ‘protection’ and ‘enhanced’ on page 29, e.g. “The populations of 150 species at risk of extinction will be enhanced, and another 500 indigenous species and their habitats will be actively managed.”

The phrase, “safeguard our vulnerable threatened species”, is not a useful or motivational vision because it uses the terms ‘vulnerable’ and ‘threatened’ in an informal way. These terms have specific meanings in the scientific Threat Classification System (TCS), and the TCS terminology should be used consistently throughout the TSS to avoid confusion.

If the current three paragraph vision is retained, it will date quickly because it names conservation programmes introduced by the current Government, e.g. Predator Free 2050, Battle for our Birds, and the War on Weeds etc may not survive future changes in government.

Please add the four “At Risk” categories to p.13 because the public should be aware that protecting some “notable” species means that DOC can’t afford to manage other species at greater risk of extinction.

Threatened	At Risk
Nationally critical	Declining
Nationally endangered	Recovering
Nationally vulnerable	Relict
	Naturally uncommon

### 2. Are there additional aspects that you think should be included in the vision?

Yes.

- Our vision is that **resilient populations of all threatened and at-risk species of plants are flourishing in the wild**. A useful supplementary vision would be to establish and maintain safe gene pools of species close to extinction in ex-situ populations in botanical gardens, fenced sanctuaries, zoos, even on traffic islands until resilient populations can be secured or re-established in the wild.
- The vision currently ignores the **geographic and social contexts of threatened species conservation**, i.e., where the threatened species are located, and where volunteers and others are willing and able to help protect them.
  - Some potential partners and volunteers may only be able to provide practical assistance close to where they live. Of the five ‘notable’ plant species, two are in Northland, one in Hawkes Bay, one in Canterbury, and one in the Chathams.

- The *Survey of New Zealanders* 2016 found that respondents did not feel comfortable spreading herbicides (35%) or poison bait (34%) via aircraft.
- We'd like to see a stronger Whole of Government commitment to these goals (or the BAP objectives), and increased funding for compliance and enforcement, and monitoring threats.

### **3. Do you agree with the characterisation of the value and current state of our native species?**

We agree that New Zealand's unique biodiversity has influenced some of the symbols which define who we are, e.g. flowers, birds and butterflies on stamps, coins and bank notes. But popular, recognisable species like the Mt Cook Lily (*Ranunculus lyallii*), flax, kauri and kowhai are not on the list of "notables", presumably because their threat status is not high enough. Such plants have value in increasing public appreciation of NZ's indigenous plants because many people can recognise them, and understand the threat to kauri. Few people will see any of the five 'notable' plants in the wild. They may not recognise many of the other 34 species as New Zealand plants.

The value of our native species goes deeper than popularity and accessibility. They are part of the ecological processes that underpin healthy ecosystems, sustainable economies and societies.

We suggest replacing the heading "We're all part of the solution" with "New Zealand's national and international responsibilities". The current title detracts from New Zealand's obligation to deliver its Sixth (and final) National Report on progress towards the Strategic Plan for Biodiversity 2011-2020, the Aichi Biodiversity Targets, and other relevant targets such as those in the Global Plant Conservation Strategy. We suggest itemising these reporting obligations (with dates) in the TSS.

The diagram on page 8 would be more helpful if it showed the numbers of species as well as the percentages. The diagram on page 12 is difficult to interpret accurately.

### **4. Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?**

Before talking about tools, the TSS should present a more comprehensive description of the threats facing threatened species. The diagram on p.10 identifies only six threats, and most of the DTSS is about one of these, introduced predators in terrestrial ecosystems.

We challenge the re-branding of rats and possums as 'predators'; both are omnivores. This "marketing" damages DOC's scientific credibility, and misses an opportunity to educate the public about omnivores and their impacts.

The DTSS identifies only five threats to plants, i.e. herbivores, weeds, industrialisation, changes in land-use, and illegal activities. At least three additional threats to plants should be acknowledged:

- recruitment failure, e.g. low fertility, gender imbalances, lack of pollinators, isolated populations with limited gene pools, and poor germination
- fires and natural catastrophes like earthquakes which can quickly wipe out small or isolated populations of threatened plants

- pathogens and parasites, e.g. Myrtle Rust, kauri die-back disease.

The Kākāpo Spotlight and the PCE’s report on birds (May 2017) provides a timely reminder of the importance of looking beyond managing ‘invaders’ to genetic management as a tool for reducing threats to birds with low or fragmented populations. PCE points out that “Genetic variation can be lost in a few decades, but it takes thousands of years for mutations to build it up again”. The conservation status of the kākāpo is still Nationally Critical despite decades of active management. On-going threats include disease, low fertility and the impacts of low genetic diversity. Threatened and naturally rare plants often have low or fragmented populations.

Nor is there much in the DTSS about threats to freshwater and marine threatened species.

## Tools

The word “tools” is unfortunate. Dictionary definitions include:

- A tool is a device or implement used to carry out a particular function, especially one held in the hand, e.g. gardening tools, rifles
- A ‘tool’ can also refer to a person used or exploited by another. Synonyms include puppet, pawn, minion, lackey, flunkey.

The BGANZ partnership is identified as a “tool”. Is ‘Predator Free 2050 Ltd’ also a “tool”? The words “actions” or “methods” may be more appropriate given the diversity of the roles DOC anticipates that volunteers and partner organisations will play in achieving the TSS.

## Brief comments on some of the identified ‘tools’.

Tool	Comment
Recovery planning	Please provide more details about the mandate and responsibilities of the proposed National Heritage Specialist Groups, including how recovery planning will identify research needs and advance Goal 3 (i.e. integrating Te Ao Māori and Mātauranga Māori.
Fenced sanctuaries	We see potential to establish populations of threatened plant species in New Zealand’s fenced sanctuaries, e.g. 50 plants of Kirk’s Daisy were planted recently by Otari staff at Zealandia and Otari.
BGANZ partnership	The new MOU is welcome because saving some threatened plant species will require specialist horticultural skills, knowledge and facilities.  Completing the National Strategy for Ex-Situ Plant Conservation (not mentioned in the DTSS), will be a major advance, and should be on the list of the Top 10 Actions.
Seed-banking: investing in the future of our native flora	Seed-banking will make a useful contribution to longer term, ex-situ conservation but as explained on p.22, it is not a silver bullet for all plant species. Ex-situ conservation also includes tissue culture, cryopreservation, field gene-banks and living collections, established to IUCN and Botanic Gardens Conservation International (BGCI) guidelines. The use of tissue culture by the Australians for Wollemi Pine illustrates the potential of this technique.
Biocontrols	Biocontrols for <i>Tradescantia</i> and three others, are described as “successes” but the word “successes” exaggerates the achievements to date. Can you provide any evidence yet of how long it takes for these biocontrols to make a

	measurable difference to the spread and density of these weeds, let alone a contribution to safeguarding threatened species?
Biosecurity	Will MPI or DOC be seeking funding from profitable industry sectors to help fund the response to Myrtle Rust, e.g. the honey industry (in return for the benefits extracted from mānuka and kānuka on public conservation lands); and the tourism industry for its use of pōhutukawa images in marketing NZ to international visitors.
Translocations	<p>Terms such as re-introduction or expansion or enrichment would be preferable to 'translocations' for plants because they communicate the objectives for different activities.</p> <p>A species by species approach should be adopted when making decisions about moving plants or animals to new locations, e.g., to diversify gene pools, establish insurance populations, or select plants for ecological restorations. The risk of loss of genetic diversity through hybridisations needs to be balanced against any benefits of expanding the gene pool of small, or isolated populations.</p>
Regulation	<p>Ensure that the implementation of the National Policy Statement on Indigenous Biodiversity, (when/if approved), is supported by sufficient training and funding to make a meaningful contribution to the DTSS and Government's Biodiversity Action Plan 2016-2020.</p> <p>The current Minister of Conservation announced that legislation with a focus on the protection of plants would be developed to complement the Wildlife Act. The text on p.25 doesn't update the Minister's earlier announcement. Is this still under consideration, e.g., by the Biodiversity Collaborative Group working on the NPSIB? What problems is it trying to solve? Could it make forestry companies responsible for the control of wilding pines down-wind from plantations? What are the implications of the WAI 262 report for statutory plant protection?</p>

1

## 5. Are there other tools we could use to help us achieve the vision?

The 10 Key Actions do not mention any tools for the management or control of herbivores on public conservation land, e.g., goats, rabbits, hares, pigs, deer, chamois, thar and wandering stock. Nor does there appear to be any initiative or programme under MBI or the National Science Challenges to support research into the development of such tools.

Fences and fenced exclosures have a long history as "tools" for protecting plants from herbivores and providing more secure sites for germination.

More site-specific tools are required to protect plants, e.g., how best to create the disturbed habitat preferred by early successional species, such as *Sebaea ovata*, and *Leptinella nana*, and when to fence out stock and when to allow light grazing to reduce risks from fire, and competition from weeds.

Text on p.18 explains that the aim of the 'War on Weeds' programme is to "inspire New Zealanders to manage invasive plants on their own properties and as part of community conservation efforts". The "Dirty Dozen" programme will raise awareness of 12-13 weeds each year, but there are now an estimated 300 environmental weed species on public conservation land. Lots of other introduced species already in NZ may become weedy under climate change. DOC also needs to be funded to advocate with regional councils for stronger regional pest management strategies. Teaching-gardens may help staff, contractors, volunteer weeders and track-builders learn to distinguish weeds from similar natives, e.g., Old Man's Beard from native clematis.

The DTSS provides little information about DOC's on-going operational weed programmes. Is funding for management of wilding pines going to reduce the funding available for managing other weeds on public conservation land?

Government's strategy for weed management could be based on the BAP statement: "By 2020, the management of weeds that compromise the integrity of significant natural ecosystems or threatened native species will have increased from current levels." It's then a matter of identifying which weeds, where, and how much additional funding will be invested by Government (through DOC, MPI and regional councils). Wilding pines and species that may be amenable to biocontrols are a very small part of the weed control what needs to be done.

## **6. Will the proposed goals help us achieve the vision and assess our progress?**

The proposed goals address only a small part of the vision, but we would celebrate in 2025 if DOC were able to show that the populations of 150 named threatened species, including 34 threatened plants had been enhanced. But it doesn't address the much bigger issue of the inadequacy of Government funding for safeguarding all of New Zealand's threatened and at-risk species which is its statutory responsibility.

The TSS needs to clarify whether DOC has suitable planning, monitoring and reporting methods/systems to assess progress towards enhancing the populations of all 150 priority species. For kokako, the objective is to increase the current population of 1600 pairs at 22 locations to 3,000 pairs by 2025. Will all recovery plans/prescriptions include similar baseline information and targets against which "enhancements" can be measured? Qualitative arrows showing 'up', 'down', or 'stable' are not good enough. Please provide some examples of the systems DOC intends to use to demonstrate what 'enhancements' have been achieved.

Population numbers can play a part, but are not sufficient, because the conservation status of kākāpō is still "Nationally Critical" despite the population increase from 51 to 150 birds. The population of Bartlett's Rata has declined from 35 to 14 plants in recent years, but its status is also "Nationally Critical". The number of remaining genomes within all populations may be useful complementary measure, (81 for kākāpō, but less than four for Bartlett's Rātā.)

We support Goal 4, (support research, particularly through the National Science Challenges to better understand data deficient species). But it's not just data-deficient plant species that need further research. Basic questions about many threatened plants still need to be answered. We now need to do for plants what the Wildlife Service and then DOC have been doing for decades to understand the biological and management requirements of bird species and tuatara. We need to know about their ecology including soil and other abiotic requirements, mycorrhizal relationships, reproductive biology (e.g., pollination, breeding system, and seed dispersal mechanisms), and germination requirements. Early DNA analyses of the genetic variability within and between different populations of the same species or genus can also avoid unnecessary duplication during seed-collecting processes.

The TSS has a section on "building our science and knowledge base (p.35)". Why not combine this with other statements and Spotlights about research in the TSS under the heading "Advancing Goal 4"? ZIP is an important initiative, but the other commitments are minimal:

- "DOC's website will provide a list of species for which more information is required to determine their conservation status and inform their conservation management."  
(p.39)

- “Universities will be encouraged to find students to review relevant information and undertake research to fill these gaps. (p. 39)”.

The forthcoming report on incorporating ethical and social concerns into the Predator Free New Zealand program deserves a mention. (See [sciencemag.org/news/2017/07/new-zealand-aims-eradicate-invasive-predators-winning-public-support](http://sciencemag.org/news/2017/07/new-zealand-aims-eradicate-invasive-predators-winning-public-support))

We were concerned to learn that biodiversity monitoring through the National Science Challenges will be done through eDNA sampling. (See [www.biologicalheritage.nz/programmes/biological-heritage-assessment/national-framework](http://www.biologicalheritage.nz/programmes/biological-heritage-assessment/national-framework)). This might be useful for some animals e.g., giant kokopu in rivers, but will be less useful for plants for the following reasons:

- aquatic DNA is meant to be a good indicator of what species are present but there is less certainty about DNA because DNA can hang around for a very long time so a species may no longer be in the area
- it is uncertain how far DNA moves spatially in soils (do you need to be right on top of where an endangered plant is growing in order to detect it?)
- eDNA doesn't measure abundance of species very accurately
- many NZ plant species aren't distinguishable with the DNA markers that are being used, e.g., lancewood and fierce lancewood wouldn't be able to be distinguished, nor any of the kowhai species.

We'd like DOC to fund, and/or advocate for more funding for research of plant DNA using more accurate DNA markers.

## **7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

The DTSS may benefit from developing some principles, rather than altering or adding to the goals, for example:

Principle 1: The (taxonomic) diversity of threatened species to be managed under Goal 1 will be increased.

Principle 2: A higher priority will be assigned to protecting and enhancing threatened species in New Zealand's most threatened ecosystems, e.g. wetlands, dunes and coastal forests.

Principle 3: Projects at or near biological hotspots (centres of endemism) will be a higher priority for Crown funding especially where local capacity and capabilities are limited by poor financial and economic health.

Principle 4: Projects about the less well-known threatened species will be a higher priority for Crown funding than species with a history of attracting interest and support from the media, ministers, sponsors, philanthropists, volunteers, territorial authorities, landowners, etc. (i.e. address the market failure in threatened species management).

## **8. Have we identified the right strategic themes?**

Comments on three of the strategic themes follow.

### **Uniting against invaders on a landscape scale**



The wording of this heading look inclusive, but the description (on p.32) focuses on mammalian predators. It only refers to browsers, weeds, invertebrates and pathogens in the final few words in the final paragraph. Perhaps this sentence could go at the beginning?

Separate calls for New Zealanders to unite against mammalian predators, or against herbivores, or against environmental weeds may be more effective than trying to persuade everyone to unite against 'invaders'. The people who have strong objections to killing animals, or the use of 1080 or other poisons, or genetic modification, may be willing to help establish living collections of local at-risk plants in fenced sanctuaries.

### **Predator Free New Zealand 2050**

We challenge the re-branding of rats and possums as 'predators' because it damages DOC's scientific credibility, and misses an opportunity to educate the public about omnivores and their impacts on New Zealand's natural heritage. Possums and rats are omnivores, not predators. Possums chew their way through thousands of tonnes of choice green shoots, fruits, berries and leaves in our native forests, and they also eat birds' eggs, chicks and insects. Ship and Norway rats and kiore eat birds, seeds, snails, lizards, fruit, weta, eggs, chicks, larvae and flowers.

Why don't understand why Government decided to target possums, rats and stoats, but not other mammalian predators such as mice, ferrets, hedgehogs, weasels, hedgehogs, feral cats, domestic cats and dogs? Some introduced birds are also predators/competitors, e.g. magpies and ravens. By focusing on possums, rats and stoats, it seems Government/DOC is content to leave all the other predators and herbivores to eat, breed and damage ecological processes on public conservation land that is not managed under an EMU.

The governance and operational arrangements for PFNZ 2050 are confusing. Can you please prepare a diagram of this 'ecosystem', showing the relationships and funding flows between DOC, MBIE, the Predator Free New Zealand Trust (established in 2013), the company Predator Free 2050 Ltd set up by Government in July 2016, ZIP Ltd, any relevant predator management projects under the National Science Challenges, and community initiatives like Predator Free Wellington, and Kiwi for kiwi programmes.

One of the components of PFNZ 2025 is to show that eradication of stoats, possums and rats can be achieved without the use of fences in a 20,000 hectare plot. It doesn't sound very efficient sense to leave herbivores and other mammalian predators free to roam and breed in areas where public funds are being spent to give populations of birds, invertebrates and reptiles the opportunity to recover.

We believe that controlling possums and rats in EMUs also benefits plant species and habitat health. If our belief is supported by scientific evidence, not just anecdotes, why doesn't DOC mention these benefits when marketing Predator Free 2050? It suggests an institutional or sponsor bias against threatened plants and the maintenance of habitat for many other species. Perhaps plant blindness is a contributing factor? (See *Plant blindness and the implications for plant conservation*, Mung Balding, and Kathryn J.H. Williams, (July 2016).)

### **Managing ecosystems at scale to protect species**

This theme focuses management interventions and partnerships on threatened species within DOC's 1,000 Ecosystem Managements Units (EMUs. This programme should be mentioned in the Top 10 Actions regardless of whether the TSS is a DOC Strategy or a Whole of Government Strategy.

We are concerned about the threatened and at risk species that are on public conservation land but are not within EMUs. What is to happen to these?

### **Focusing beyond public conservation land**

This theme explains that threatened species on private land can be protected through schemes like QEII and Nga Whenua Rahui. The lists of the priority species should identify the species which have populations reliant on on-going support through these schemes.

The PCE reported in *Saving New Zealand Birds*, (May 2017) that the QEII Trust currently receives 150–210 expressions of interest from landowners each year, but is only able to enter into 110 new covenants. It may be time for the Government to provide more financial assistance for QEII to process new covenants that will protect threatened species or their habitats. The Trust generally pays for the surveying of a new covenanted area and half of the cost of fencing it.

DOC also has a responsibility to minimise the invasion of weeds, weed seeds and other pests from public conservation land onto adjacent private land, especially where neighbouring land contains habitats and ecosystems that are not well-represented or in good condition on public conservation land. (DOC as a responsible neighbour to farmers, horticulturalists, vineyards).

## **9. Do you agree with our top 10 actions?**

The Top 10 Actions do not present a coherent summary of what the Government or DOC are going to do to achieve the TSS goals for 2025.

The only DOC operational activities that will advance Goals 1 and 2 are No.1 (Predator Free 2025), part of No.3 (Store some seeds in a storage facility), and part of No 6. (Continue support for freshwater habitat restoration).

Five actions appear to be funded through other Votes or led by other Ministers.

No 2 (Improving tools and technologies for predator control;

No.4 Biosecurity 2025;

No.5 Progress key regulatory reforms;

No.6 (Freshwater reforms, particularly implementing environmental limits);

No 8 Further scientific work on 500 data deficient species.

Actions 9 and 10 are part of governance support. They are important, e.g., how well does the governance system for the Predator Free 2050 programme integrate and reflect Mātauranga Māori, and does the TSS aid the partnership approaches under development with iwi post Treaty Settlements? Shouldn't this be part of Goal 3?

### **Comments on specific Top 10 Actions follow:**

No.1: The actions under Predator Free 2025 include achieving predator-free status for all nature reserve islands. Please show the total number of nature reserve islands (“over 50?”) and the number that are currently free of predators, omnivores and herbivores. (A basis for monitoring the company’s performance.)

No. 2: We see no reasons for limiting this action to predator control. Why not modify it to include wasps and some mammalian herbivores?

No.3: Expand the wording with a list of bullet points identifying other actions to protect threatened plants:

- complete the development of a standard approach for identifying regionally significant plants (a joint initiative between DOC and regional councils)
- complete the National Strategy for Ex-situ Plant Conservation (with BGANZ)
- present the lists of priority plant species by ecosystem and conservation management strategy area (see table 1, p.16)
- investigate levels of “plant blindness” in New Zealand, and work with iwi and other stakeholders to find ways of overcoming this barrier to the appreciation and conservation of plants.

No. 6: The practical component, i.e. continue to support freshwater habitat restoration, is overshadowed by the regulatory reforms which are advancing very slowly. Many freshwater restoration schemes aim to improve water quality (e.g. for swimming), or improve habitat for sports fish or fishers. Opportunities to remove pest fish, or restore the natural diversity of freshwater ecosystems, habitats and species are often overlooked. A specific reference to restoring the biodiversity of different kinds of wetlands would send an important signal to regional decision-makers.

No 7: We regard this as a high priority because Heenan’s 2011 analysis (using Biodiverse) showed that only 40% of the areas that are hotspots for endemic plant species, and only 29% of hotspots for endemic genera, are on public conservation lands. Implementation of off-setting under the long-awaited National Policy Statement on Indigenous Biodiversity may generate new opportunities to give statutory protection to more of New Zealand’s biodiversity hotspots.

No. 9: Include other governance responsibilities such as establishing agreed terms of reference for the new Natural Heritage Specialist Groups. The organisational learnings in the following papers may be helpful:

- Ewen, JG, Adams, L. and Renwick, R. (2013). New Zealand Species Recovery Groups and their role in evidence-based conservation. *Journal of Applied Ecology* 2013, 50, 281-285
- some of Sir Peter Gluckman’s writings on political decision-making processes, e.g. Scientific advice in a troubled world. (February 1, 2017).

No. 10. This action is to “develop and implement a comprehensive monitoring regime that can be used by all those involved in species management to produce timely useful information on threatened species, and specify a trigger to avoid extinction or increase the threat status of a species”. This sounds great, but the DTSS provides no assessment of the “fitness for purpose” of the current monitoring and decision-support systems. New IT systems are notoriously expensive to design and implement, especially when historic data from many different sources has to be cleansed and incorporated. Which agency is responsible for leading and funding this initiative? (Statistics New Zealand? MfE?)

In future, will DOC be able to state the date when the on-going existence of 1-3 populations of all threatened and at risk species was last confirmed at each of its known locations?

## **10. Are there any other actions that should be included, and any actions that should be removed?**

**Add Climate Change:**

The Biodiversity Action Plan 2016-2020 recognised that climate change was a strategic issue with implications for the conservation of threatened species. Some of the actions are DOC’s responsibility; others lie with MBIE.

NATIONAL TARGET	Improved understanding of the impacts of climate change on biodiversity informs better management of vulnerable ecosystems and indigenous species
6.1	By 2020, improved understanding of climate processes is enabling better prediction of New Zealand’s future climate, and identification of impacts of a changing climate on natural resources (MBIE)
6.2	By 2020, management of vulnerable ecosystems and species will increasingly consider the impacts of climate change (DOC)
6.3	By 2020, New Zealand’s understanding of the compounding pressures of climate change and other anthropogenic pressures on indigenous biodiversity will have improved from current levels (DOC)

The TSS presents an opportunity for Government and DOC to reassure New Zealanders and the world that New Zealand is starting to plan how to protect and enhance its unique biodiversity from the impacts of climate change. McGlone and Walker (2011), commented in 2011 that “If New Zealand is not investing sufficient resources or political capital in the fight to stop ongoing loss (of biodiversity), why would it invest further to avert potential, but uncertain, future loss?”

McGlone and Walker see the arrival of new weeds and the increased invasiveness of existing weeds as being among the most troubling likely consequences of climate change. Shepherd, C., Burns, B, and Stanley, M. (2016), comment that to their knowledge, climate change is currently not addressed in weed management policy or practices by national or local government agencies.

**12. Have we identified the right number of priority species?**  
 (Circle or highlight one) • Too many • About right • **Too few**

**13. Have we identified the right priority species?**

DOC needs to be much bolder in acknowledging that many threatened species can’t be managed because DOC doesn’t know enough about them or how to manage them.

We have confidence in the methodology /algorithms used to determine the 100 species identified by scientific criteria, but further explanation is needed in the TSS text, (something simpler than the algorithm). The verbal explanation and three-level diagram presented at the consultation meeting on 19 July were very helpful. Presenting the case for including seven Lepidiums but none of the rare hebes may help.

It would be good if the TSS included more information about some of the next steps, e.g. the development of recovery plans/ prescriptions, briefings for partnership organisations, and how the TSS will be integrated with priorities in statutory conservation management plans, and the availability of third party resources. We understand that prescriptions are to be developed for each species, outlining their geographic location, reproductive biology, ecology land tenure, key threats faced, and the capabilities and resources required to enhance their populations.

An indicative date for reviewing the TSS would be helpful, so we know when different species of Myrtaceae will be merged into the framework.

**14. Do you think other species should be prioritised ahead of the ones listed? And why?**

We think pīngao, the golden sand sedge, is a 'notable'. At one time it was found on almost every sandy beach, from Northland to Rakiura and the Chatham Islands. Today only a few remnant populations remain. Its conservation status in 2012 was At Risk – Declining. Is its status now improving, static or declining? This species is of considerable cultural importance, but still faces diverse risks.

The Conservation and Environment Science Roadmap (Feb. 2017) (p.56) mentions the quillwort in some exalted company. Is this being managed in an EMU?

“New Zealand now has a large list of threatened and endangered plants and animals, including the quillwort (a critically endangered aquatic fern), the kiwi species, Maui’s dolphin, the New Zealand sea lion, and the Canterbury knobbed weevil.” (p.56).

See the following blog for a liverwort that is about to become extinct.

<http://blog.tepapa.govt.nz/2015/11/12/goodbye-to-the-lettuce-liverwort-its-going-extinct/>

**15. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

The focus of the DTSS is too narrow. It is likely to safeguard more birds and some other animals from three mammalian omnivores and predators, but it’s not clear what it will do for NZ’s threatened plants, or for threatened freshwater or marine species.

The list of 50 notable species includes just seven marine species (5 mammals, 1 shark and 1 invertebrate). There are none on the list of 100 species identified by scientists. DOC’s website says that “New Zealand has a rich diversity of marine habitats, with over 15,000 known species. Scientists estimate that there may be as many as 65,000 marine species in New Zealand waters. Some scientists have estimated that as much as 80% of New Zealand’s indigenous biodiversity may be found in the sea, but less than 1% has been surveyed.

[<http://www.doc.govt.nz/nature/habitats/marine/new-zealands-marine-environment/>].

The following stretch goal from DOC’s SOI 2016-2020 could be listed on the TTS Top 10 Action Points. “A nationwide network of marine protected areas is in place, representing New Zealand’s marine ecosystems.” Are there any agreed targets yet for new marine protected areas?

There are 12 freshwater fish on the list of 150 Priority Species, but the TSS says nothing about the tools available to enhance their populations. Preventing the spread of introduced sports fish and pest fish into new streams and rivers has to be an on-going priority. The existing systems don’t seem to have prevented didymo spreading into new catchments. Will keeping cows out of streams contribute to healthier fish populations?

Weekes et al<sup>1</sup> ( ) provide the following description of challenges in freshwater conservation:

*New Zealand's freshwater ecosystems support a diverse and unique array of endemic flora and fauna. However, the conservation of its freshwater biodiversity is often overlooked in comparison to terrestrial and marine environments, and is under increasing threat from agricultural intensification, urbanisation, climate change, invasive species, and water abstraction. New Zealand has some of the highest levels of threatened freshwater species in the world with, for example, up to 74% of native freshwater fish listed as endangered or at risk. Threatened species are often discounted in water policy and management that is predominantly focussed on balancing water quality and economic development rather than biodiversity.*

**Table 1: Sample layout for priority TSS plant species by major ecosystem type and conservation management strategy area. (\*not a priority threatened species)**

Ecosystem	Conservation Management Strategy		
	Northland	Wellington	Canterbury
Coastal including cliffs, dunes	<i>Pittosporum serpentinum</i>	<i>Pimelia actea</i> * <i>Leptinella nana</i> *	<i>Olearia adencarpa</i> *
Coastal forest	<i>Tecomanthe</i>		
Forests	<i>Metrosideros bartlettii</i>	<i>Olearia gardneri</i> *	
Wetlands, including estuaries		<i>Pterostylis micromega</i>	
Alpines			<i>Ranunculus paucifolius</i>
Tussock grasslands		<i>Acaena rorida</i> *	

<sup>1</sup> The demise of New Zealand's freshwater flora and fauna: a forgotten treasure. Emily S. Weeks, Russell G. Death, Kyleisha Foote, Rosalynn Anderson-Lederer, Michael K. Joy and Paul Boyce. *Pacific Conservation Biology* 22(2) 110-115 <https://doi.org/10.1071/PC15038>

[Redacted]

**From:** [Redacted]  
**Sent:** Sunday, 30 July 2017 9:24 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

[Redacted]

Email: [Redacted]

q1: Yes but not through 1080 poisoning.  
q2: Regulations on Corporations such as Sanfords and Fontera who are exploiting animals and our once beautiful environment.  
q3: Yes.  
q4: No.  
q5: Regulations to curb corporations polluting. Funding for the SPCA so that they can ensure all cats and dogs are desexed.  
q6: No.  
q7: Regulations on corporations who are exploitative. Tighten up laws on the cutting down of native trees or any tree that is a food source for birds.  
q8: I do not like the war like language which encourages killing other animals in the name of conservation.  
q9: No.  
q10: Yes the mass dropping of 1080 poison which kills outside the target species and is horribly cruel. It is not humane because of the prolonged death that it inflicts on animals. According to a 2007 publication studying postmortems on possums and rats. Their diet is mostly made up of seeds, fruit, shoots, leaves and invertebrates.  
q11: too few  
q11comments: Sea creatures such as saltwater crayfish are just about extinct in the Hauraki Gulf and now need protecting in other parts of New Zealand.  
q12: No, more sea creatures could be included.  
q13: No comment.  
q14: No because we have not identified the real threat which is humans and their economic activity. Over fishing resulting in by catch which will ultimately destroy the ecosystem of our oceans. Pollution of our water ways by dairying and the lack of money to clean up our waterways in the towns and cities of NZ.  
q15: "When the last tree is Cut Down, the Last Fish eaten, and the last Stream poisoned, You will realize that you cannot eat money." Alanis Obomsawin, an Abenaki from the Odanak Reserve.

**From:** [REDACTED]  
**Sent:** Sunday, 30 July 2017 10:48 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Name:** [REDACTED]  
**Organisation:**

**Email:** [REDACTED]

q1: Yes, its a good start

q2: It talks about how we need to "work together in partnerships". However as outlined in the draft DoCs vision of who work together seems limited to certain areas or industries. There's a very small section about how the captive sector can be involved and nothing much about education - can only think of it being mentioned in the who section. Zoos have thousands of patrons who come through their doors and are willing and want to be more involved via advocacy, research, volunteers and funding for projects

q3: I'm assuming 15 frogs is because DOC has counted the ESU's??? if that's the case then all should be on the top 150 because of the 'isolated populations.

q4: Prioritisation of species recovery - obviously makes sense to do this. However as we don't even know all of the species in NZ how can you possibly define a select few for prioritisation.

Captive management - tiny blurb that does not acknowledge or even realise the asset/tool that they are.

Education - where is it?

q5: Above

q6: Yes and no:

At least 50 of the species in the 150 already have good programs behind them - why not choose an additional 50 to enhance the populations??

Definition of supporting research would be good - also the criteria on how research is chosen would be interesting

q7: Maybe to cover more species a goal should include a certain percentage of the country is actively managed and successful (conservation wise). Furthermore it could be broken up into a grid so that pockets are evenly distributed across NZ - which would help with issues such as carrying capacity and bottle-necking which is often the problem on mainland islands.

q8: yes

q9: yes

q10:

q11: too few

q11 comments: see above comments

q12: no

q13: As said above, how can you create a list when all species in NZ haven't been properly classified or even identified

q14: If this plan has a good work plan and more funding is given to it. Kiwi conservation gets 6.8 million per year and the government has committed 7 million for however many years it was for the predator free NZ - for the whole country..... seems a bit out of whack.

q15: Ambitious draft, hope it happens. Don't forget to utilize all the resources available to you even if it doesn't sit within your box - ie. captive organisations.



# New Zealand's Threatened Species Strategy: submissions for consultation

#96

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
(if on behalf of an organisation)

Email:

Signature:

*(we accept a typed signature if  
no electronic signature)*



**Submission:**

**You can answer all or some of the questions.**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

*No, it doesn't even come close. Given the goal of Predator-free NZ by 2050, the government must commit a great deal more money and resources to protect the majority of threatened species to ensure their survival between the period from now to 2050. "Battle for our Birds" should be extended to cover the majority of public conservation land on a regular basis.*

2: Are there additional aspects that you think should be included in the vision?  
*There needs to be a major focus on halting habitat loss, along with driving down predator numbers. Intensive management of critically endangered species must continue. All government departments need to co-operate in achieving this.*

3: Do you agree with the characterisation of the value and current state of our native species?

*The value of our native species is of the highest order.*

4: Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?

*There needs to be more resources, and much better management within DoC and between government Departments/Ministries, and mandated involvement of local government.*

5: Are there other tools we could use to help us achieve the vision?

*The strategy should include an expansion of research and monitoring, to give more detailed and reliable information on the ongoing state of the environment.*

*DoC needs to return to a full and critical advocacy role at central, regional and local government levels.*

6: Will the proposed goals help us achieve the vision and assess our progress?

*Nowhere near!*

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

*A minimum of 50% of threatened species should be starting to recover by 2025. 80% of threatened species should be actively managed for recovery by 2030.*

8: Have we identified the right strategic themes?

*Yes, so long as it involves all relevant central and local government agencies, and not just DoC.*

9: Do you agree with our top 10 actions?

10: Are there any other actions that should be included, and any actions that should be removed?

*Regular monitoring and reporting on progress towards the goals.*

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right • **Too few**

**Comments:**

12: Have we identified the right priority species?

*Too few.*

13: Do you think other species should be prioritised ahead of the ones listed? And why?

*See above.*

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

*No, not as it stands.*

15: Do you have any further comments regarding the draft Strategy that is not covered above?



< Local Councils play an active role in keeping our communities healthy. >

# Department of Conservation's draft Threatened Species Strategy

Local Government New Zealand's submission to the Department of Conservation

31 July 2017

## We are. LGNZ.

LGNZ is the national organisation of local authorities in New Zealand and all 78 councils are members. We represent the national interests of councils and lead best practice in the local government sector. LGNZ provides advocacy and policy services, business support, advice and training to our members to assist them to build successful communities throughout New Zealand. Our purpose is to deliver our sector's Vision: "Local democracy powering community and national success."

This final submission was endorsed under delegated authority by Doug Leeder, Chair of Local Government New Zealand's Regional Sector.

## Introduction

Thank you for this opportunity to submit on the Department of Conservation's draft Threatened Species Strategy.

This submission is made on behalf of all sixteen regional councils and unitary authorities across New Zealand. We have a history of working with our regional communities to maintain biodiversity, particularly on private land, and the protection of threatened species as a component of overall ecosystem health is important to us.

Regional councils' and unitary authorities' shared interest in relation to the draft strategy relate to their:

- maintenance of biodiversity function in the Resource Management Act (RMA);
- leadership responsibilities under section 12B of the Biosecurity Act 1993 (the BSA) in activities that prevent, reduce, or eliminate adverse effects from harmful organisms that are present in New Zealand, in relation to their regions;
- regional advocacy responsibilities under the Local Government Act 2002, whereby regional councils represent their region on matters of local interest and concern.

Councils view the draft New Zealand Threatened Species Strategy as a positive opportunity to raise the profile of threatened species and their importance to New Zealand, and to improve their management and management of biodiversity generally. Regional councils have an important role, particularly on private land, in the management of biodiversity assets. We believe it is important that councils and DOC are working together closely across a range of fronts to deliver more effectively for our biodiversity.

Regional Councils have also recently produced a report; "*Addressing New Zealand's Biodiversity Challenge, A Regional Council Thinkpiece on the future of biodiversity management in New Zealand*". This report provides further context to our submission and over the next while regional councils will be advocating for the shifts mentioned in the report and will be seeking further dialogue with DOC on this.

We welcome the opportunity to, not only contribute to the refinement of this draft strategy, but also to work more closely with DOC, and others, in its implementation and on-going refinement. In that regard, we would welcome a meeting with DOC to discuss the issues raised in this submission.

Comments are provided using questions set out by DOC in its submissions template.

## 1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

- A strategy that sets out how DOC is going to support a more collaborative approach to recovering threatened species, to set an example in effectively managing threatened species on public conservation lands, and to provide national leadership will be welcome.
- The declared intent to manage more threatened species with a goal to halt their decline and to restore them to healthy populations is supported although we suggest the strategy should identify how DOC intends to oversee the protection of the full suite of threatened species rather than just a subset.
- We note that the vision seems to be inconsistent with DOC's 'Vision, purpose and outcomes' stretch goal for 2025 to manage 90% of threatened species.

## 2. Are there additional aspects that you think should be included in the vision?

- The long term survival of species depends on functioning and sustainable ecosystems. This should be acknowledged and included in the vision. An ecosystem's context, including a stronger focus on the part species play in functioning and sustainable ecosystems, would be appropriate, as would consideration of the implications for ecosystem services in managing threatened species.
- We suggest a more future-focused vision that includes not only an ecosystems context, but which also serves to further engage and empower others to augment DOC's efforts, would be appropriate.
- The strategy seems to be largely focused on terrestrial species and threats. Marine fish stocks and native freshwater species, and associated ecosystem effects deserve further attention.
- In highlighting the importance of Predator Free 2050's ambitious goal, there would seem to be room for this strategy to be focused on a similarly ambitious goal.
- We note that preventing further declines and extinctions, and maintaining biodiversity conservation outcomes is a shared responsibility and beyond the capacity of DOC alone, especially where threatened species exist on private land.
- The draft strategy is silent on resourcing. Recognising that DOC's resources are already stretched, we expect that either additional government funds will be provided, DOC's priorities will change to accommodate those set out in the strategy, or complementary resources are made available by other agencies. The approach to be taken should be clear.
- We suggest an important purpose of the strategy is as a basis for advocating for, and leveraging further, funds. We would like to see an aligned funding model that identified resourcing needs and responsibilities for securing further support nationally, regionally and locally.
- It is unclear from the current draft how Regional Council current efforts on ecosystem biodiversity protection are, and can, contribute to strategic species recovery goals. Further consultation as the strategy is refined will be useful in identifying opportunities, and ensuring regional perspectives are appropriately incorporated.
- Given the close links between species-focused work and wider habitat protection and management, predator control, biosecurity, liaison, research and advocacy undertaken by Regional Councils, there are compelling reasons for a more collaborative approach in implementing this strategy. We look forward to closer involvement in refining the strategic goals of the strategy, influencing associated institutional policies, and identifying technical roles and inputs, for ourselves, and other partners.

### 3. Do you agree with the characterisation of the value and current state of our native species?

- The 'State of our species' chart on page 12 appears to double count threatened and data deficient species, giving a potentially misleading picture.

### 4. Have we identified the right tools to help us achieve the vision?

- Regional Councils have statutory responsibilities, including under the RMA 1991, Biosecurity Act 1993 and Local Government Act 2002. These responsibilities are reflected in policies and strategies that are pertinent to the maintenance of biodiversity, including the conservation of threatened species, especially on private land. While councils' actions are driven by regional and local priorities, it is important that we have a collective understanding of the priorities for biodiversity management across New Zealand and that we work to improve alignment between regional and national priorities.
- Councils have extensive experience and considerable in-house capacity in habitat, catchment and ecosystem management, including identifying and prioritising ecosystems for management, animal pest and weed control, biodiversity inventory and monitoring, and working with iwi, landowners and community groups. There may be significant opportunities to enhance conservation outcomes through stronger alignment, further information sharing and collaboration.
- We agree that priorities need to be set for the allocation of resources. We suggest further consideration of the entire suite of currently threatened species is needed, including regional information and perspectives. This list should be regularly reviewed using appropriate criteria.
- Linking species and site management priorities should allow species and ecosystem conservation goals to be optimised.
- There is a risk that in re-setting its priorities to align with this strategy, DOC may reduce its effort in regionally important areas of public conservation land. Further and on-going dialogue is needed to ensure regionally important sites, perhaps including threatened species, are appropriately prioritised.

### 5. Are there other tools we could use to help us achieve the vision?

- Greater alignment of operational programmes, regardless of tenure, including the prioritisation of sites for active management and the development of joint operational work programmes and species recovery plans etcetera, regardless of tenure.

### 6. Will the proposed goals help us achieve the vision and assess our progress?

- As stated earlier, consideration of the full suite of threatened species in setting priorities will be required if the vision is to be achieved.
- It is unclear who is responsible for each of the 10 actions in the strategy. It is also unclear how some of the actions relate to the foundations, tools, goals and vision. For example, Action 4, 'Biosecurity 2025', is a Ministry for Primary Industries initiative that is not directly related to threatened species management. In this case, the strategy does not clarify how this external document helps meet the strategy's goals and vision. Relationships between this strategy and other initiatives should be clear.

- Implementation of the national Predator Free 2050 program can be expected to have a positive impact on many threatened species. Consideration needs to be given to how other pest species, such as feral cats and deer, which are not included in the Predator Free 2050 framework, are to be treated at the strategic and action levels. Management of these threats should be reflected by an accompanying action in the strategy.

## 7. Are there alternative goals that you think will better achieve the vision and assess our progress?

- Goal 4 appears to be more of a tool than a goal. A target to fill knowledge gaps for data deficient species could be included to develop an appropriate and measurable goal.
- The implications of climate change are likely to have an increasing influence on our ability to protect threatened species. Some consideration of these issues and how they might be addressed would be appropriate.

## 8. Have we identified the right strategic themes?

- In general terms, the strategic themes are aligned to regional council thinking, focusing on active management, working within people, at a landscape scale and based on good science. However we note that reference to regional councils, particularly in relation to working off conservation estate, is minimal. Regional councils have a long history of working with landowners, implementing operational work programmes on private land. Biodiversity management on private land is very much the role of regional councils and we have much expertise in this area; partnering with regional councils on private land will be vital to achieving goals in this area.
- We note that the strategy does not have an accompanying action plan, and that the links between strategic goals and tactical actions is not clear. Making actions and their associated connections explicit would enhance the value of the strategy as a guiding document.
- We support the intention to integrate Te Ao Maori and Mātauranga Māori into species management programmes. Regional Councils have similar goals and some have complementary capacities. Further discussion on how cooperative efforts might contribute to these goals being achieved would be useful.
- We support the emphasis in the strategy on research aimed at improving our understanding of data deficient species to support more effective management. Research could be critical in allowing consideration of future pressures and opportunities. It will also underpin the development of a 'whole-of-system' approach.

## 9. Do you agree with our top 10 actions?

- In general terms, yes, however it is unclear who is responsible for each of the 10 actions, and how some of the actions relate to the foundations, tools, goals and vision. Actions should incorporate the foundations and tools, and be consistent with the goals and vision.

## 10. Are there any other actions that should be included, and any actions that should be removed?

- See suggestions under other headings.



### 11. Have we identified the right number of priority species?

- The need to set priorities that reflect management capacity is acknowledged. It will be important that all species for which some information is available are prioritised for management, or for further investigation.
- Setting priorities should not be to the detriment of other threatened species that are not on the list. There is a risk that any changes in DOC priorities could lead to increasing pressure on other agencies and, possibly, on rate payers, to maintain conservation effort.
- A capped number of 150 threatened species identified for management may not be the most suitable approach. The list should be capable of increasing the number of managed species to ensure it meets the strategy's goals and vision, as well as DOC's stretch goals, and be flexible enough to respond to external changes. It should be a "living list", subject to ongoing regular review.
- We observe that the current list reflects a bias towards species currently being managed on public conservation land. Council staff would welcome opportunities to identify regionally important sites containing threatened species, including some that occur solely, or largely, on private land.
- A collaborative, iterative approach to setting and reviewing priorities should allow regional and local perspectives to be considered, and for regional and national criteria to be developed, that allow a more consistent approach to prioritisation between agencies.

### 12. Have we identified the right priority species?

- In general, marine, freshwater and non-vascular species appear to be under-represented.

### 13. Do you think other species should be prioritised ahead of the ones listed? Why?

- See other responses.

### 14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

- This document is a useful first step which will hopefully provide a basis for further refinement.
- As a strategy, it is not consistent with DOC's Statement of Intent 2016-2020 intermediate outcome to ensure that "the diversity of our natural heritage is maintained and restored", nor with DOC's stretch goal for 2025 that "90% of our threatened species across NZ's ecosystems are managed to enhance their populations".
- Unclear linkages between the vision, goals and actions undermine the value of the current draft as a strategic document. It would be useful to outline how the foundations, tools, goals and actions align with, and complement, each other.
- Partnerships with local and regional councils are referred to throughout the strategy, including in the strategic themes section, as vital for success. Regional councils are keen to work with DOC to further develop clarity around roles and responsibilities in this regard, noting that without joined up action across public and private land, the aspirations of this strategy will not be realised.
- We agree that partnerships will be a key to further progress being made and would observe that, given our roles, responsibilities and capacities, regional councils are likely to be key partners in any strategy aimed at maintaining what's left of New Zealand's biodiversity.



Your ref:  
Our Ref: A2613745

31 July 2017

Department of Conservation  
[threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz).

Tēnā koe

### **Toi Moana - Bay of Plenty Regional Council's Comments to the Draft Threatened Species Strategy**

Thank you for the opportunity to comment on the above consultation document. The Bay of Plenty Regional Council does not wish to be heard on this submission.

#### **Our Organisation**

The Bay of Plenty Regional Council is responsible for the sustainable management of resources within the Bay of Plenty region. Our role is determined by Central Government through statutes such as the Local Government Act and the Resource Management Act, and is different from that of territorial authorities (district and city councils). Some of our key roles are:

- Regional planning for land, water quality and air quality;
- Setting environmental management policies for the region;
- Allocation of natural resources;
- Flood control;
- Natural hazard response;
- Soil conservation;
- Pest control / biosecurity;
- Public transport;
- Strategic transport planning;
- Regional economic development; and
- Strategic integration of land use and infrastructure.

#### **Summary**

We support the general intent of this document. Please find our detailed comments attached. We trust you find them constructive.

Yours sincerely

  
  
**General Manager Strategy and Science**

**TOI MOANA - BAY OF PLENTY REGIONAL COUNCIL'S COMMENTS TO THE DRAFT THREATENED SPECIES STRATEGY**

<b>Reference</b>	<b>Discussion</b>	<b>Recommendation</b>
Whole strategy	Council requests clarification as to the term of the strategy and the prioritised species list. Council suggests that if the list of prioritised species will require updating more often than the Strategy itself; that it may sit better in a more regularly updated action plan. See also comments on Page 42-48	That the Department include a term and review date for the Strategy and prioritised list of species. Alternatively, the prioritised species list might sit within a regularly updated action plan, or be replaced by criteria for prioritisation that could be applied at different scales including national and regional.
Whole strategy	Council agrees that mammalian predation is a very important threat for many species, but there are also many species for which mammalian predators are less important (particularly plants). Council suggests that more focus be given in the Strategy to the importance of protecting species and habitats from the impacts of introduced herbivores (possums, deer, goats, pigs, and wallabies); altered water quality and hydrology (wetland species), to the effects of predation by feral cats, and to the effects on habitat quality of inappropriate subdivision, use and development.	That more focus be given in the Strategy (including in the actions) to the importance of protecting species and habitats from the impacts of introduced herbivores (possums, deer, goats, pigs, and wallabies), effects of reduced water quality and altered hydrology in wetlands, and to the effects of predation by feral cats. Further, that the Strategy link explicitly to the Department's important role as an advocate for the habitats of threatened species in the RMA process, and that a goal be set around monitoring and participating in RMA proposals potentially affecting threatened species' habitat, and preventing degradation / facilitating improvement.
Whole strategy	The strategy seems to be largely focused on terrestrial species and threats. The exploitation of marine fish stocks or native freshwater and wetland species, and associated ecosystem effects deserve further attention.	That more focus is given in the Strategy to protecting marine and aquatic taxa, or that the reasons for the lack of focus on these taxa are explained within the document.
Whole strategy	The implications of climate change are likely to have an increasing influence on our ability to protect threatened species. Some consideration of these issues and how they might be addressed would be appropriate.	That some consideration of issues around the potential effects of climate changes on threatened species is included in the Strategy along with how they might be addressed.
Whole strategy	Council consider there are may be significant opportunities to enhance conservation outcomes through stronger alignment, further information sharing and collaboration between DOC and Regional Councils.	That further consideration is given to how the Strategy could encourage / facilitate improved collaboration and alignment between DOC and Regional Councils.
Page 3	The Draft Strategy states that the goals and prioritised species list will guide a variety of organisations in their investment decisions and can be used to	That the Strategy (or an action/implementation plan) provides greater detail in order for Councils (and others) to

<b>Reference</b>	<b>Discussion</b>	<b>Recommendation</b>
Final paragraph	<p><i>“help rank predator control projects according to the contribution they will make in achieving species goals”.</i></p> <p>Council are of the view that this Draft Strategy is lacking the detail required to be useful for guiding prioritisation of biodiversity work in our region. It is unclear from the current draft how Regional Councils can contribute to strategic species recovery goals.</p> <p>Council requests clarification as to whether this Strategy will be followed up with an action/implementation plan providing detail on where and how species will be managed to achieve the goals of the Strategy, and how our Council may have input into development of such a plan.</p> <p>Council also suggests that the current list of prioritised species reflects a bias towards species currently being managed on public conservation land. This may limit the opportunity for Councils (and others) to contribute to strategy goals.</p>	<p>identify how they can contribute to strategic species recovery goals.</p> <p>That consideration is given to reducing the bias towards species that are already managed and species occurring on public land. Also to providing criteria for prioritising species that can be regional at scales.</p>
Page 4 Purpose	<p>Council doesn't consider that the purpose outlined on Page 4 aligns well with the content of the Strategy. For example most of what is included in the Strategy are existing commitments and programmes rather than 'further steps'.</p>	<p>That the purpose of the Strategy might be amended to better reflect the content of the Strategy (or vice versa).</p>
Page 4 Vision	<p>Council consider that the vision statement would benefit from being a more succinct invocation of the desired end state. Additionally, we note that the vision seems to be inconsistent with DOC's Statement of Intent 2016-2020 intermediate outcome to ensure that 'the diversity of our natural heritage is maintained and restored' and with DOC's stretch goal for 2025 that '90% of our threatened species across NZ's ecosystems are managed to enhance their populations'.</p>	<p>That the vision statement is amended to make it more succinct, ambitious, and inspirational. Also that the vision is amended to align more closely with DOC's Statement of Intent 2016-2020 intermediate outcome to ensure that 'the diversity of our natural heritage is maintained and restored' and with DOC's stretch goal for 2025 that '90% of our threatened species across NZ's ecosystems are managed to enhance their populations'.</p>

<b>Reference</b>	<b>Discussion</b>	<b>Recommendation</b>
Page 5 Goals	<p>Council requests clarification as to whether this Strategy will be followed up with an action plan providing further detail as to how the goals of the Strategy will be achieved; and how progress against goals and actions will be measured.</p> <p>We also suggest that the links between the vision, strategic goals, and tactical actions is not clear. It would be useful to outline how the foundations, tools, goals and actions align with and complement each other.</p>	<p>That the Strategy is followed by an action plan detailing how the goals of the Strategy will be achieved (including the sites that will be managed), and how progress against the goals will be measured.</p> <p>Also that the vision, goals and actions are more explicitly linked and aligned.</p>
Page 5 Goal 1	Council requests clarification as to whether Goal 1 relates to threatened or at risk species (as opposed to species in general).	That the wording of Goal 1 is amended to make it clear this goal relates to threatened species.
Page 5 Goal 1 and 2	Council would like to see greater emphasis on the importance of basing management on sound science incorporated into the Goals.	That Goals 1 and 2 are amended to give greater recognition to the importance of basing management on sound science.
Page 5 Goal 4	Council suggests that Goal 4 is more of a tool than a goal, as it is business as usual and does not represent an increase or re-prioritisation of effort.	That Goal 4 is amended to be both measurable and time-bound.
Page 25 Regulation	Council note that change in regulatory tools, such as biodiversity protection on private land, may have significant implications for the regional sector. Consultation with Regional Councils would be needed in developing any such legislation to ensure it was fit for purpose.	
Page 32 Managing ecosystems at scale to protect species	<p>The Draft Strategy states (pp 32): <i>“This Strategy will integrate species recovery with ecosystem conservation, thereby securing maximum benefits for both threatened species and the habitats that support them.”</i></p> <p>Council supports DOC’s focus on maximising species protection whilst ensuring a representative range of New Zealand’s ecosystems are healthy and functioning. However we feel the Draft Strategy does not provide clear explanation as to how this Strategy will integrate species recovery and ecosystem conservation.</p> <p>Council and the Department have recently collaborated to identify and prioritise 430 High Value Ecological Sites in the Bay of Plenty Region, including a number of threatened species populations, as part of our shared regional biodiversity goal. Each site has a ‘management prescription’ that</p>	That the Strategy provides clearer explanation as to <u>how</u> the Strategy will integrate species recovery with ecosystem conservation; including more explanation as to how Predator Free 2050 and War on Weeds will contribute to the goals listed in the Strategy, and how regional biodiversity priorities such as those agreed between the Department and Council in the Bay of Plenty fit into the bigger picture nationally.

Reference	Discussion	Recommendation
	both agencies agree should be implemented, It would be great to see how the Threatened Species Strategy linked to regional initiatives like this one, which we understand are becoming more common around NZ.	
Page 35 Building our science and knowledge base	Council is concerned that the level of resources devoted to science and the number of science staff in the Department has been heavily reduced, and would like to see DOC move towards having a higher level of science capacity to support iwi and community groups.	That the Strategy provides a pathway to greater level of technical science support being available to species recovery work by community groups and iwi at a local level.
Page 39 Working together in partnerships	<p>The Draft Strategy states that <i>“The New Zealand Government will continue to provide leadership for the conservation of our natural environment, including our species, to ensure the effective national coordination of programmes, prevent duplication and avoid conflict between competing priorities”; and that: “We need to empower iwi to regain their role as kaitiaki”</i></p> <p>Council agrees that DOC has a clear mandate for leadership but emphasises that DOCs leadership mandate extends beyond the national level. DOC leadership is required at a regional and local level to support, empower and manage iwi and community groups, and to facilitate collaboration.</p>	That the Strategy provides a pathway to increased capacity for leadership by DOC at a local/regional level. See also recommendation for page 32 comments.
Page 36 Focusing beyond public conservation land	The Draft Strategy states that: <i>“where necessary, statutory processes will safeguard against the effects of development and extraction.”</i> Council supports the emphasis in the strategy on research aimed at improving our understanding of data deficient species to support more effective management. However, Council is very concerned that DOC seems to have severely decreased resources dedicated to fulfilling its statutory role in protecting species and habitats through Resource Management Act processes.	That the Strategy place increased emphasis on DOC’s role in, and commitment to, protecting species and habitats through Resource Management Act processes. The importance of this should not be under-estimated, especially given the speed of development in many parts of New Zealand, and the risks that this development can pose to threatened species and their habitats.
Page 29	The Draft Strategy states that with respect to managing for protection, ‘protection’ means long term protection of species including managing all threats to secure species from extinction. Council seeks clarification as to whether this means that the species is not declining (i.e. is on a stable or improving trajectory)?	That further clarification is provided as to the meaning of ‘protection’, including whether this means that species will be on at least a stable trajectory (i.e. not declining).
Page 42-48 List of priority	Council suggests that it may be more appropriate to include a set of criteria for prioritising species rather than a list of species - given that the list is likely to change over time. Perhaps a list of species would sit better in an	That consideration be given to including criteria that will be used to prioritise species rather than, or in addition to, the current list of prioritised species. Criteria for species

<b>Reference</b>	<b>Discussion</b>	<b>Recommendation</b>
species	<p>action/operational plan.</p> <p>Council also suggests that the current list reflects a bias towards species currently being managed on public conservation land.</p>	<p>prioritisation that could be applied at regional as well as national scales would be useful for helping Councils prioritise, especially if these criteria could be integrated with ecosystem/habitat prioritisation techniques.</p>
<p>Page 40 Top 10 Actions</p>	<p>Council acknowledges the value of having existing commitments and programmes being undertaken by the various players compiled in one place.</p> <p>However, we note the Draft Strategy does not :</p> <ul style="list-style-type: none"> <li>• identify many 'further steps'</li> <li>• make clear how the Strategy will complement the New Zealand Biodiversity Action Plan 2016-2020 (or future New Zealand Biodiversity Strategy).</li> <li>• make clear how Predator Free 2050 and War on Weeds will contribute to the Goals listed in the Draft Strategy.</li> <li>• identify who is responsible for each of the 10 actions in the strategy</li> <li>• make clear how some of the actions relate to the goals and vision.</li> </ul>	<p>That the Strategy provide further explanation as to:</p> <ul style="list-style-type: none"> <li>• The way in which the Strategy will change the way the Department prioritises its work and resourcing?</li> <li>• How the Strategy will complement the New Zealand Biodiversity Action Plan 2016-2020, and future updates of the New Zealand Biodiversity Strategy?</li> <li>• How DOC will measure the contribution made by each action to achieving the Strategy goals?</li> <li>• Who is responsible for each of the 10 actions?</li> <li>• How the actions relate to the goals and vision?</li> </ul>
<p>Page 40 Action 7</p>	<p>Council would like to see DOC play a much more active role in protection of lowland waterways. We would like DOC to partner with us in protected native fish habitats in lowland environments.</p>	<p>That the Strategy highlights the role that DOC can play along with local government in protecting and improving habitat for freshwater fish and other aquatic species.</p>
<p>Page 40 Action 10</p>	<p>Request further clarification as to the intention of Action 10 – is the intention to have a common monitoring technique across species? This would be very difficult, if not impossible.</p>	<p>That Action 10 is amended to make its purpose clearer.</p>

**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 9:22 a.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
Organisation: Te Runanga o Te Rarawa: Te Rarawa Anga Mua  
Email: [REDACTED]

q1: Yes

q2: ability for local taonga species to be acknowledged e.g. rifleman population for northland ( only in Warawara)

q3: yes

q4: yes - appreciate the effort to ensure collaborative approach involving Iwi and Hapu

q5: what has been identified is encompassing, the challenge will be funding

q6: yes

q7: see above

q8: yes

q9: yes

q10: no

q11: aboutright

q11comments:

q12: yes - though see comment about local taonga species

q13: no

q14: yes

q15: How is this all going to be funded?



# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter or contact person:	[REDACTED]
Organisation name: <i>(if on behalf of an organisation)</i>	independent consultant specialising in strategy, policy and programme design for biodiversity and climate change
Email:	[REDACTED]
Signature: [REDACTED] <i>(we accept a typed signature if no electronic signature)</i>	



**Submission:**

This submission responds to questions 14 and 15.

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

15: Do you have any further comments regarding the draft Strategy that is not covered above?

**Summary:**

New Zealand's species are in trouble and unfortunately *New Zealand's Threatened Species Strategy—Draft for Consultation* (the Strategy) illustrates the ongoing failure of New Zealand's institutions to address the problem. New Zealand is a developed country, with a rich natural and cultural heritage, highly skilled and committed people, and a wealthy economy. Failing to save our species will be seen by our children and grandchildren as a short-sighted lack of leadership – or, worse than that, a simple lack of analysis and coordination that could have easily been overcome, but wasn't.

A "strategy" is that rare opportunity to think systemically about the problems, and a "Government" or "New Zealand" strategy is that even rarer opportunity to review the institutional barriers to meaningful action. Conservation science—the practice and policy of conservation of biodiversity—is a mature field with many tools to help us do that. It is disappointing that rather than present a strategy for future action, based on good analysis, best practice and a commitment to take on the drivers of species loss, this Strategy presents a list of *ad hoc* activities that are already underway.

The Strategy emphasises over and over again that partnerships with communities and business are required, then ignores the inconvenient fact that threatened species are in fact being lost on private land and through the extractive and polluting activities of communities and business.

It focuses simplistically on the threat of predators (which, I agree is a top priority) but then all but ignores avoidable ongoing losses and the drivers of those losses which are directly attributed to farming, fishing, pollution and urban development.

With its disproportionate focus on DOC's role and public conservation lands, the Strategy neglects key actors and institutions whose policies, laws and actions directly affect New Zealand's threatened species, namely, regional councils, the Ministry for the Environment, the Ministry for Primary Industries and the Resource Management Act, along with the range of private actors and NGOs. It also neglects to explicitly consider the institutional gap in responsibilities for biodiversity and threatened species, although that is revealed in the *ad hoc* nature of the proposed actions.

The Director-General's introduction compellingly states: "When 2050 comes, we want to be there with all our native species, not just a fortunate, charismatic few. Our nature is a package. We cannot leave the future of our native species to chance." In the end, the draft Strategy does not address the broader concern of the "package of nature" and, in lacking a clear and comprehensive approach grounded in international best practice, does in fact leave the fate of New Zealand's precious species very much to chance.

**Key points made** in this submission include:

- The Strategy **lacks internationally accepted frameworks and tools for conservation science and management, in particular an approach which includes protected areas** across landscapes and

seascapes containing threatened ecosystems and threatened species, as the cornerstone for species **conservation**.

- The Strategy **lacks systematic, comprehensive assessment of threats and corresponding management actions**, instead having an almost exclusive focus on predators and weeds.
- The Strategy **lacks a sensible plan to develop the information system required** for good threatened species conservation
- The Strategy has a **convenient but artificial focus on the existing, DOC-managed conservation estate**, without adequate regard to the threatened species that occur in agricultural and urban landscapes on private land.
- **It's not clear whose strategy this is- DOC's or New Zealand's?** The Strategy has a convenient focus on the role of DOC, without due consideration to the roles of other agencies and local government. The Strategy 'passes the buck' to Predator Free 2050 Inc. which does not yet have a strategy, and to the NPS on Biodiversity under development—effectively abdicating the Government's responsibilities.

**Recommendations for priority actions** for New Zealand's threatened species management:

- Develop a comprehensive and evidence-based '**New Zealand Inc' biodiversity strategy** that both safeguards ecosystems and prevents the decline of species, includes **systematic conservation planning across** all tenures and jurisdictions across landscapes and seascapes.
- Commit to developing a **network of effectively managed, ecologically representative, well-connected protected areas**, integrated into the wider landscape and seascape, as the cornerstone of species conservation.
- Urgently invest in a **centralised, comprehensive and spatially-explicit (map based) database** containing distributions and status of species and ecosystems, tenures, protected areas and management actions.
- Urgently undertake an **institutional and legislative review to address current gaps** and weaknesses in policy and responsibilities for biodiversity protection and species management.
- **Support the development of regional-scale spatially explicit biodiversity management plans** to provide a platform for coordination of various actors including DOC, landowners, councils, NGOs and community groups.

**The Strategy lacks internationally accepted frameworks and tools for conservation science and management, in particular area-based management**

The Strategy presents a set of *ad hoc* activities that are not firmly grounded in a comprehensive approach to ecosystem management and biodiversity conservation. Conservation science has developed in leaps and bounds over the last three decades resulting in robust, science-based frameworks for conservation of biodiversity, ecosystems and threatened species.

Broadly speaking, protection and management of threatened species has two complementary approaches:

The first is necessarily grounded in area-based conservation of ecosystems and habitats, with well-managed protected areas as the cornerstone. Systematic conservation planning gives us the tools to

prioritise areas for protection and management that are representative, of adequate size, are well-connected and that provide the best outcomes for a range of species.

The development of conservation actions, both within these protected areas and across landscapes and seascapes, must come from analysis of the threats to species and to ecosystems and the drivers of those threats. Management actions are then put in place to address those drivers and threats. It is under this broad approach that predator control fits, along with other key management actions such as preventing clearing of native ecosystems, weed removal and fencing out livestock.

The Strategy mentions DOC's NHMS tool as a way to prioritise areas for management. There is a need to properly implement the approach underpinning NHMS, but critically, the approach of systematic conservation planning needs to also be applied outside the current conservation estate, and the principles underlying the prioritisation need to be transparent to enable scientists outside DOC to engage with the process.

While the Strategy refers to "Managing ecosystems at scale to protect species" on pp. 32-35, it discusses only landscape scale pest-management while the critical themes of protection and connectivity of ecosystems and habitat for threatened species are given trivial attention. In the end, this Strategy does not give due attention to the management of representative and connected protected areas as the necessary foundation for threatened species conservation.

The second, complementary, approach to threatened species conservation is to develop species-specific recovery plans that identify status, threats, distribution and that implement management actions to address those specific challenges. As a last resort, when a species is on the brink, we have the option to take highly interventionist *ex-situ* steps to bring them back including breeding programs and translocation. While the Strategy does mention species-specific/ recovery plans, it does not provide any detail about how such plans are developed.

Applying these approaches to New Zealand's biodiversity and threatened species can clearly be done in systematic and thoughtful ways. Conservation science gives us tools and approaches tried and tested around the world, and well-documented best practices to fall back on. However, the current Strategy says little about how we will make use of this wealth of wisdom.

### **The Strategy lacks a systematic and comprehensive assessment of threats, drivers and management actions, with a disproportionate focus on predators**

The Strategy lacks a systematic assessment of threats that create the conditions for "threatened species", instead focusing on predators as the key threat to be addressed, and placing unjustified emphasis on one tool: predator control. Admittedly, this is one area where New Zealand's expertise, born of necessity, has received world-wide recognition, however, the Strategy does not explain how this one response will be the saviour for New Zealand's threatened species.

In not presenting a systematic and comprehensive assessment of threats and drivers, the Strategy conveniently avoids addressing the ongoing and critical loss of threatened ecosystems and habitats for threatened species as a result of development and agricultural expansion and intensification, and the impact on plant threatened species of browsers. Indeed, Government continues to sponsor some of these key threats (for example, through expansion of irrigation in drylands), and avoids the need to support politically difficult policies that ensure the protection of biodiversity, species and ecosystems across landscapes.

In essence, it appears the Government is avoiding a clear analysis of threats and drivers because it may be politically uncomfortable.

### **The Strategy lacks a sensible plan to develop the information system required for good threatened species conservation**

While the Strategy states that DOC “has detailed knowledge of where many species live, the threats that exist in different areas and the positive impacts that will result from different actions such as predator control”, my understanding is that in fact this information is patchy at best, mainly on the public conservation estate and is retained in fragmented systems that include spreadsheets on individuals’ PCs. There is no centralised capture of the critical information that is required to support systematic analysis of distributions of species, threats, drivers, and assessment of management actions. This is a critical gap and needs to be addressed urgently, with the resulting information system made publicly available.

### **The Strategy has a convenient but artificial focus on the existing, DOC-managed conservation estate**

Clearance and loss of indigenous habitats continues across New Zealand, the highest rates of loss are occurring in the most threatened environments<sup>1</sup>. Ecosystems in these most threatened areas are habitat for a disproportionately large percentage of New Zealand’s most seriously threatened species<sup>2</sup>.

Threatened species are under immense pressure from predators, weeds invasions, and the clearing of indigenous ecosystems to make way for farming. Across landscapes, small fragments and isolated remnant species populations lack resilience, have compromised genetic structure and reduced regeneration, making them increasingly vulnerable to extinction. Almost all of this is occurring on non-conservation land.

The attention given in this Strategy to the critical and ongoing loss of threatened species and ecosystems on non-conservation land and waters is woefully inadequate. “Focusing beyond public conservation land” is a stated theme on p. 36 but there follows only two suggested mechanisms here.

The first describes the relatively small role private protected areas currently play, with no discussion of the need to put in place policies and financial instruments that considerably expand this role.

The second defers to the process for developing the NPS on Biodiversity under the RMA as the major fix for the lack of protection of threatened species on private land, even though there are no details about this mechanism. The RMA has never been implemented effectively to protect biodiversity due to myriad problems throughout the system, and it is difficult to see how this will be the tool to effectively protect threatened species on private land.

### **It is not clear whose strategy this is—DOC’s or New Zealand’s?**

The responsibilities and scope outlined in this Strategy are ambiguous and confused. It is called “New Zealand’s Threatened Species Strategy” and the Minister’s introduction presents it as a whole-of-New-Zealand strategy, stating that “This draft Threatened Species Strategy is the Government’s plan to halt decline and restore healthy, sustainable populations of native species.” Then the Director-General’s

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<sup>1</sup> defined by Land Environments of New Zealand at Level IV, of which there are 500

<sup>2</sup> for example, de Lange, P.J., Rolfe, J.R., Champion, P.D., Courtney, S.P., Heenan, P.B., Barkla, J.W., Cameron, E.K., Norton, D.A. & Hitchmough, R.A. (2012) Conservation status of New Zealand indigenous vascular plants, 2012. Department of Conservation, Wellington, New Zealand *and* Walker, S., Price, R., Rutledge, D., Stephens, R.T.T., & Lee, W.G. (2006) Recent loss of indigenous cover in New Zealand. *New Zealand Journal of Ecology*, 30, 169-177.

introduction refers to the Strategy as “the Department of Conservation’s draft Threatened Species Strategy.”

The ambiguity continues throughout the Strategy, for example, page 3 states the document will support decision making by Predator Free 2050 Ltd., DOC, local councils, NGOs and philanthropists and yet it is unclear how it will do that.

It is worth recalling the words of the Auditor-General when reviewing DOC’s work in 2012:

*“The task crosses geographical boundaries – between private and public land and waterways – and organisational boundaries at various levels of government and outside government. Ecosystems and the species within them have no regard for boundaries between public and privately owned environments or how central and local government are organised.”*

*Auditor General, 2012<sup>3</sup>*

In the end, I am left with the impression that the Strategy was developed without adequate collaboration across agencies and without due regard to the roles and responsibilities of actors other than DOC. And that rather than deal with the more-difficult (but sorely needed) process of developing a national ‘New Zealand Inc’ strategy, passing reference only is made to the roles of the RMA, the NPS on Biodiversity under development, Predator Free 2050 Ltd and of regional councils. This alone ensures this Strategy is wholly inadequate for the task it purports to take on.

#### **Recommendations for priority actions for New Zealand’s threatened species management:**

- New Zealand make use of the obligation to prepare a National Biodiversity Strategy and Action plan under the CBD by 2020, to ***develop a comprehensive and evidence-based biodiversity strategy that both safeguards ecosystems and prevents the decline of species.*** The development of this strategy should make best use of the tools and techniques of modern conservation science including systematic conservation planning. Just as our biodiversity does not fit neatly within ownership lines on a map, this ***strategy must address all tenures and jurisdictions*** across landscapes and seascapes.
- New Zealand commits to ***develop a network of ‘effectively and equitably managed, ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscape and seascape’*** as the cornerstone of species conservation thus meeting NZ’s commitment under the CBD Aichi target 11 and ensuring habitats for many threatened species (to note, the current arrangement of public conservation lands *does not* achieve this target).
- In order to inform the development of a systematic approach to biodiversity, New Zealand must urgently ***invest in a centralised, comprehensive and spatially-explicit (map based) database containing distributions and status of species and ecosystems, tenures, protected areas and management actions.*** This needs to be developed now in order to provide analysis for the

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<sup>3</sup> Office of the Auditor-General (2012). Department of Conservation: Prioritising and partnering to manage biodiversity. <http://www.oag.govt.nz/2012/biodiversity>

development of a 2020 strategy. This will also enable the systematic identification of research and monitoring activities to fill in the knowledge gaps.

- The New Zealand government must urgently **undertake an institutional and legislative review** to address current gaps and weaknesses in policy and responsibilities for biodiversity protection and species management.
- The New Zealand government should encourage and **support the development of regional-scale spatially explicit biodiversity management plans**. Planning at this scale allows a better understanding of the places in the landscape where species and ecosystems occur. The planning process provides a platform for dialogue and better coordination of the management actions of various actors including DOC, landowners, councils, NGOs and community groups.

### **In conclusion**

The recommendations above are essential building blocks for the protection of New Zealand's species and ecosystems—those currently categorised as threatened as well as the rest of the “package of nature”. At first glance, they don't have the attractive catch-cries of “Battle for the Birds” or “War on Weeds” or “Predator Free 2050”. Rather, they are approaches and tools that provide the analysis and evidence to better target these programmes, and to address the other drivers of loss of New Zealand's treasured species. Indeed, catch-cries can be crafted for these to make them more visible and understandable to the public and a broader range of stakeholders.

There is no doubt that, as showcased in the Strategy, there are many people at DOC, in communities and in philanthropic organisations putting their heart and soul to the issue of saving New Zealand's species. However, without a cohesive, strategic approach to coordinating and prioritising across agencies, and addressing key drivers of loss including ongoing clearing across private land, there will be little chance of overall success.

I am left with the overall impression that this Strategy is a glossy brochure, possibly timed in the months before an election, to showcase several DOC initiatives and to demonstrate the Government is taking action on threatened species. There are many other comments that can be made about the appropriateness of the goals and actions, and the prioritisation of species for management, but I have restricted my comments to the need for a cohesive conceptual framework to underpin this Strategy. If that issue were to be addressed, I am convinced that the entire document would look quite different.

# New Zealand's Threatened Species Strategy: submissions for consultation

#101

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## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

[Redacted]

Organisation name:  
(if on behalf of an organisation)

personal

Email:

[Redacted]

Signature:

(we accept a typed signature if  
no electronic signature)

[Redacted]





## Submission:

### You can answer all or some of the questions.

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

The vision is highly selective and somewhat bias towards a mishmash of species, some obviously are valid priority species others need no further investment other than biosecurity to remain completely secure (e.g. tuatara). The vision does not lay out clear, accountable and measurable objectives against which it's progress can be measured. The vision does not adequately recognise the threat classification system in its entirety as a hugely powerful prioritisation tool and does not mention the NZ Biodiversity Strategy, written in response to New Zealands signing of the CBD. Rather, I feel that the TTS cherry-picks from this list and mixes it with species that are easy to generate short-term positive PR because we are already delivering good conservation management for them.

The vision includes a statement about existing national initiatives (PF2050, Battle for our Birds, War on Weeds) which is at the heart of achieving the safeguarding of some of our vulnerable threatened species. However, these major initiatives do not address the full suite of invasive mammalian predators that threatens our biodiversity. If even in part, successful, PF2050 is likely to ultimately worsen conservation status for all our threatened lizards and many invertebrates as mice replace the removed rat biomass, and weasel and cat populations are released from competition from stoats in many ecosystems. To be sincere, the vision must extend to include concepts that are technically sound for the protection of the range of taxa it goes on to identify for recovery.

2: Are there additional aspects that you think should be included in the vision?

I would like to see a wider acknowledgement of the large number of species identified through our threat classification system that are absent from the document with a strategy for how they will be managed to ensure none become functionally extinct. I would also like to see the NZ Biodiversity Strategy given clear reference. Within the "predator-free" vision I would like to see additional emphasis placed on controlling other invasive predators, specifically **mice, weasels, hedgehogs** and **cats** to protect NZ lizards and other susceptible taxa. As predators such as rats and stoats are controlled (under the PF2050 initiative), there is the potential for harmful effects on native reptiles, amphibians, invertebrates and small passerines to increase as the remaining mammalian predators increase in abundance in response to the release from competition and/or switching of their prey. In as many cases as possible, I would like to see the full range of mammalian predators controlled at sites where susceptible threatened species are present, rather than just a subset of predators.

3: Do you agree with the characterisation of the value and current state of our native species?

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

Investment in development of pest control tools and techniques for unresolved pest management issues is missing from the list. Continued investment in tools for species we can control is needed, and development of new tools to control mice, weasels, hedgehogs, wasps and cats at a landscape scale are urgently needed. We are making good progress directly and indirectly in some of these areas. For instance BFOB has started to consider the role aerial 1080 plays in the potential recovery of lizards and DOC are planning to construct leaky fences within which sustainable mouse control strategies will be tested, but these efforts require proper resourcing and strategic coordination to ensure our conservation needs are delivered upon with maximal efficiency.

5: Are there other tools we could use to help us achieve the vision?

6: Will the proposed goals help us achieve the vision and assess our progress?

I don't understand “enhanced national population”. The definitions on p. 29 of the draft strategy are not specific and would not enable clear measurement or reporting of implementation of the strategy.

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

I would define timeframes within which it is intended to see species move down the threat classification list. Also, add a specific goal about gaining knowledge about and thereby reducing the number of Data Deficient species.

8: Have we identified the right strategic themes?

In addition to the 5 strategic themes identified we suggest that climate change be identified as a key theme that will be critical to securing our biodiversity.

We also suggest the following detail be included under existing themes:

- The “United against invaders” the theme needs to expand to address a broader range of invaders, including mice, hedgehogs, weasels, cats, wasps and ferrets.
- Under the “Managing ecosystems at scale to protect species” theme, it is important to acknowledge that many threatened species need comprehensive management of a much greater range of pests than can currently be achieved at landscape scale. It is

easy to fall into a trap of reporting on hectares with pest control while species within those hectares go extinct.

9: Do you agree with our top 10 actions?

Yes, in general, but see below for suggested improvements to them.

10: Are there any other actions that should be included, and any actions that should be removed?

Action points 1 & 2 must include the full suite of invasive mammalian predators that prey on native biodiversity, rather than the narrow focus on the PF2050 species (rats, stoats, possums). This is critical to protecting all native lizards as well as many of invertebrate and bird taxa.

Action point 5 should include specific mention of climate change as a key threat requiring regulatory/policy reform in order to minimise impact on native biodiversity.

Action point 8 needs to be more proactive than simply listing 500 data deficient species for further work. It needs to be targeted around securing funding to reduce the list of data deficient species to a target number and understanding enough about them to give them a threat ranking and stream them for management if required.

Action point 9 could be made more useful and specific. It should include commitment to implement the proposed National Heritage Specialist Groups with sufficient resources to achieve their goals.

Action point 10 need greater clarity on how BACI and/or comparative treatment to non-treatment monitoring of management outcomes will be employed so that we maximise our learning from inevitably adaptive management programmes. There is overwhelming evidence that unless eradication can be achieved, the density impact function of pest species on our threatened taxa is dynamic and therefore necessitates this approach.

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right • **Too few**

**Comments:**

12: Have we identified the right priority species?

I would like to see a clear focus on the Threatened species and Data Deficient species as opposed to the At Risk species, particularly those without a decline profile that are listed as Relict or Recovering.

13: Do you think other species should be prioritised ahead of the ones listed? And why?

Overall, we support the algorithm used to rank species and the principles it encapsulates (i.e. complementarity, taxonomic representativeness, cost and likely success of management). In upholding these principles, but focussing on the most urgent taxa, we suggest the following tweaks to the list of 150 priority species:

- **ADD** Alborn skink (Nationally Critical) – potential for extinction in 5 years without management. Ongoing work may mean this species becomes less of a concern in the near future but until it does it should be considered.
- **ADD** cobble skink (Nationally Critical) – potential for extinction in 5 years without management
- **ADD** Tautuku gecko (Nationally Endangered) – known from only 2 sites, both on private land with no pest control, extremely low detection rates for this species
  
- **REPLACE** jewelled gecko (At Risk – Declining) with rough gecko, starred gecko or West Coast green gecko. The latter three are considered Nationally Vulnerable and are at greater risk of extinction than the jewelled geckos.
- **REPLACE** Cook Strait striped gecko with Coromandel striped gecko. Both are Nationally Vulnerable, but the latter doesn't have a secure mammal-free island population.
  
- **REMOVE** Duvaucel's gecko (At Risk – Relict) – secure populations on multiple mammal-free offshore islands
- **REMOVE** Tuatara (At Risk – Relict) – secure populations on multiple mammal-free offshore islands

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

I am not at all confident that our vulnerable species will be safeguarded by the strategy. Regarding PFNZ as a holistic solution to threatened species recovery exposes a terrifying naivety and simplicity of understanding. The larger strategies outlined by the document are ideal for large, charismatic and well-known bird species but are largely inappropriate for the majority of threatened taxa recovery. The failure to include investigation into the role and mitigation of direct and indirect impacts from mice, weasels, ferrets, cats and hedgehogs leaves a broad suite of our threatened species on an assured trajectory to extinction.

I do not think it is either appropriate or possible to expect mechanisms such as the National Science Challenge to address these needs as they are basic biological processes and do not fit the funding criteria. I cannot see market driven private conservation business such as ZIP, NEXT etc. being a useful solution in this area as they primarily serve the needs of funders and sadly it seems most corporate sponsors of such work are uninterested in non-charismatic species or incapable of grasping the need for sustainably managing mainland ecosystems for the persistence and recovery of small, obscure species.

15: Do you have any further comments regarding the draft Strategy that are not covered above?

It's a shame that the document does not encompass or refer to a wider vision and strategy for the sustainable future of that includes the necessary measures for addressing climate change, a shift to sustainable resource use practices and a concerted effort to prevent further erosion of the conservation agenda, which should sit as a fundamental priority for a forward-thinking nation, along-side healthcare, education, a strong independent judiciary. I worry that the shifting of responsibility for conservation on to the community and the discretion of wealthy donors opens the door to bias and market forces to dictate the terms rather than quantitative, scientifically robust process. How does volunteer nursing and emergency room GPs or corporate sponsored schools and courtrooms sound? Let's just take a moment to look across the globe and consider the outcomes of these sorts of approaches to society where they have been adopted and what the alternatives might be. This is not a partisan political opinion, it is an apolitical analysis of what works well for society and what does not based on the available evidence from even the quickest glance at the top 20 countries on the Human Development Index ([http://hdr.undp.org/sites/default/files/2015\\_human\\_development\\_report.pdf](http://hdr.undp.org/sites/default/files/2015_human_development_report.pdf)) if you make a comparison with the World Happiness Index and consider the dominant philosophies, policies and politics of those doing well compared to those doing badly (<http://worldhappiness.report/ed/2017/>).

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or contact person:

[Redacted]

Organisation name:  
*(if on behalf of an organisation)*

Email:

[Redacted]

Signature:

[Redacted]

*(we accept a typed signature if  
no electronic signature)*



**Submission:**

**You can answer all or some of the questions.**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

The list of species you propose has little science behind it, and does make me scratch my head on who on earth come up with it. Not stating you will stop species from becoming extinct speaks volumes. I totally support more work needs to be done for threatened species and biodiversity as a whole as the departments focus almost makes it look like the department of recreation and this document makes it sound more like the department of conversation.

2: Are there additional aspects that you think should be included in the vision?

Better use of the species optimization process, more outcome focus with tangible achievable results. Show me how you are going to achieve goal 1 & 2. Goal 4 - Agree in having good science, but science should support species management, not a self-servicing purpose in its own right, what real benefit came out of the \$10 million spent on stoat research, we modified a trap (went from Fenns to Doc 200's) was it revolutionary – no

You also missed out individuals from your vision, I do not relate myself to any of your categories, nor should I, but I sure as hell have dedicated a lot towards biodiversity over the last 20 years. My pateke work is a donation of roughly \$600,000 of my time (in kind donation) during this time, and turned a species around from facing extinction to now “recovering”.

3: Do you agree with the characterisation of the value and current state of our native species?

NO - If you truly valued biodiversity you would have already put enough effort into the biodiversity strategy so we would not be in this state. Do I believe our threatened species numbers will look better as a result of this strategy in 8 years' time, not a shit show in hell. But prove me wrong.

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

As you have been stuffing around with recovery group formations for the past 6 years I wonder if you have the ability to use the tools effectively.

5: Are there other tools we could use to help us achieve the vision?

Start running contestable funds or prize competition for innovation, otherwise you will never know. You do not have a central database of trap capture data for all projects in NZ, your own stoat trapping practices vary all over the country. Get some of the basics right so you can learn from it, get rid of 2/3rds of your compliance red tape (self-imposed bureaucracy). Stop having restructures every 5 minutes as your staff are your biggest assets and tools and need to feel valued so they can get on and do the job.

6: Will the proposed goals help us achieve the vision and assess our progress?

No it is all too wishy washy, you can make the numbers look like you want.

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

Yes - Remove your self-imposed bureaucracy, get over the risk adverse cave creek mentality that has crippled the place for 25 years. Stop making the paperwork harder than the conservation goals themselves.

Put some hard numbers against the species you are going to save, and show me real plans on how you are going to get there, otherwise this strategy becomes yet again another great door stop like our CMS's.

8: Have we identified the right strategic themes?

I agree with your themes, except individual species and large scale ecosystem restoration sometimes do not go hand in hand, so a theme on ensuring you do not manage a species into extinction is needed.

9: Do you agree with our top 10 actions?

1. Achieve the Predator Free 2025 goals including:

- Continuing with Battle for our Birds – monitoring and taking appropriate action when a major mast event occurs

Agree but keeping the public on side year after year of continuous 1080 drops is going to wear thin, and then what?

- 1 million additional hectares of predator control

What level of predator control and targeting what pests? What species will not become extinct or become more threatened by this control? (easy to control possums over this area, but if stoats or rats should be your key predators that need reducing, this total could be pure rhetoric

- Eradicating predators from at least 20,000 hectares of mainland New Zealand without the use of fences

Ummm, pretty sure kiwi zones are in excess of this number already???



- A predator-free status for all nature reserve islands

Great goal

- The ability to eradicate at least one mammal predator.

More clarity please - sas that from the mainland of NZ or just islands?

2. Continue to invest in improving tools and technologies for predator control by:

- Focusing the science system through the Conservation and Environment Science Roadmap and the Biological Heritage Science Challenge.

- Supporting innovation by the private sector through companies like Goodnature and R&D joint ventures such as ZIP Ltd.

Supporting ZIP is a must, jury is still out on good nature and stoat control

- Continuing to improve the efficiency and effectiveness of 1080 as a mission-critical tool for conservation.

100% agree

3. Identify a priority list of threatened and at risk plant species, and ensure that their seeds are held in a recognised seed storage facility by 2025.

Also stop being precious and get them into garden centres, stop being purists. Give them a dollar value and they will save themselves (same with species), not too many endangered freshian cows out there.

4. Biosecurity 2025

- Strengthening New Zealand's biosecurity system as outlined in the November 2016 Biosecurity 2025 Direction Statement.

Totally agree, but look in the mirror, argentine ants at Whangeri doc office, mmmm wonder how they got there. Myrtle rust on Roul island then the mainland???

5. Progress key regulatory reforms:

- New marine protection legislation to provide more flexible tools for protecting marine ecosystems.

Well over due, but hope it is more than just talk.

- The continued development of a National Policy Statement for Indigenous Biodiversity by the stakeholder-led Biodiversity Collaborative Group.

Never heard of the stakeholder-led biodiversity collaborative group, thought I was a stakeholder, maybe not....

6. Implement freshwater reforms, particularly setting and implementing environmental limits; and continue support for freshwater habitat restoration.

Sounds good

7. Identify and publish threatened species 'hotspots' both on and off public conservation land to identify the key areas and threatened species for potential protection.

Long over due

8. Select 500 of the data deficient species to focus researchers on further scientific work.

9. Ensure that national recovery planning systems and processes are fit for purpose, efficient and integrate mātauranga Māori. f Incorporate Māori principles and knowledge

10. Develop and implement a comprehensive monitoring regime that can be used by all those involved in species management that:

- Provides timely useful information on threatened species

As long as the monitoring isn't at the expense of management of the species.

- Specifies a trigger for intervention to avoid extinction or increase the threat status of a species.

Totally, but we are only just coming up with this now????

10: Are there any other actions that should be included, and any actions that should be removed?

Ability to generate enough revenue needed to make a difference is missing. Partnerships is a start, but we need a serious revenue strategy to achieve the outcomes. ie tax tourists at the border \$20/visitor

11: Have we identified the right number of priority species?

- Too few

### Comments:

12: Have we identified the right priority species?

Well pateke are not mentioned anywhere in the document, yet other species that are in "recovery" are, and lesser at risk species are included, your so called algorithm must have started with pin the tail on the donkey.

13: Do you think other species should be prioritised ahead of the ones listed? And why?

Hell yes

Any species not secured on islands with populations less than 8,000 individuals should be on your list. Those above it should be seriously questioned as to how much funds are directed at them.

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

It will stop common species from going extinct in the next 8 years, but do not see it stopping some of our most endangered species from facing extinction.

15: Do you have any further comments regarding the draft Strategy that is not covered above?

Sick of the rhetoric

Centre for Biodiversity and Biosecurity  
University of Auckland  
Tāmaki Campus, Bldg 733  
Private Bag 92019  
Auckland



31 July 2017

## **New Zealand's Threatened Species Strategy – Draft for Consultation**

Comment from the Centre for Biodiversity and Biosecurity, a Joint Research Centre between Landcare Research and the University of Auckland, [www.biodiversity-biosecurity.auckland.ac.nz](http://www.biodiversity-biosecurity.auckland.ac.nz).

The Centre for Biodiversity and Biosecurity (CBB) welcomes the opportunity to comment on the New Zealand's Threatened Species Strategy, draft for consultation, produced by the Department of Conservation. This submission has been compiled from comments from members of the CBB.

### **Summary**

The threatened species strategy has been developed in recognition of the threats to native species, primarily arising from vertebrate pests including rats, stoats and possums and introduced plants and habitat loss. The strategy outlines the Government's plan to halt the decline and restore healthy, sustainable populations of native species. It lists the steps needed to restore species at risk of extinction and to prevent other species from becoming threatened.

The strategy has been developed within the framework of the Government's intention to make New Zealand predator-free by 2050, by eradicating possums, stoats and rats. In addition, the Botanic Gardens of Australia and New Zealand has recently signed a MOU with DOC to develop living plant collections, collaborate on research and help develop a seed bank to prevent other species from becoming threatened. Other government initiatives to protect native species include the Battle for the Birds where landscape level pest control was introduced in response to mast beech seeding, and the War on Weeds with an annual list of the 'Dirty Dozen' to tackle invasive plants threatening native bush.

The Strategy builds on Predator Free 2050's targets, New Zealand's international commitments to biodiversity and DOC's threatened species work. There is a commitment to increasing populations of 150 priority species by 2025, and to be actively managing 600 by 2030. It is underpinned by the partnership between government agencies and Māori.

## Structure of the draft document

The initial section of the draft document highlights the critical role played by the Government's initiative Predator Free 2050 as a springboard for protecting threatened species (pages 2 and 3) before summarising the key elements of the threatened species strategy (pages 4 and 5).

Comment – While recognising the critical role of Predator Free 2050 in species conservation, we consider that the threatened species strategy should start with an overview of the state of conservation of native New Zealand species. Some of this subject matter is covered in the draft document, but given its importance, we believe it should be highlighted in the introduction, as it forms the basis of the threatened species strategy. Although invasive mammals are a key threat for many threatened species, they are not the only threat, and for some species not the main threat. By placing Predator Free 2050 in such a prominent place without balancing with other threats, it overly emphasises the importance of invasive mammals.

This overview/introduction should summarise the “state of our species” and include:

Background information on New Zealand flora and fauna noting the high levels of endemism of New Zealand species (see page 8);

Number of threatened species by taxonomic group (page 12)

A summary of the key threats to New Zealand species listed as a series of sub-headings or bullet points. Many are discussed in page 10 of the draft, i.e.

- Introduced mammalian predators (rats, stoats, possums, cats, dogs);
- Introduced herbivores (rabbits, deer, goats, possums, chamois, pigs);
- Invasion of native habitats by exotic weeds and garden escapees;
- Loss and fragmentation of native ecosystems;
- Pollution of freshwater and marine ecosystems, including plastic rubbish in marine environments;
- Changes in water flow and water quality in rivers, lakes and streams;
- Introduced browsers and predators in freshwater ecosystems.

Comment – the threat to freshwater ecosystems by invasive algae such as *Didymo* should also be recognised.

Threats posed by human activities including fisheries by-catch, wildlife smuggling and biosecurity breaches.

Comment – We consider that two additional threats should be listed in this section. The first is climate change, which may alter species ranges and populations. The

second is the threat of new animal and plant diseases. The threat posed by plant diseases is recognised in the draft, with a sidebar on kauri dieback (page 30). The potential threat of myrtle rust to species of Myrtaceae is also discussed (page 22), and we would point out that this section should be updated as myrtle rust is now on mainland New Zealand.

Impediments to threatened species conservation including lack of knowledge of many species (page 12), the legislative framework (page 10).

The section Top 10 actions needed for progress on threatened species goals (page 40) focuses on a number of these issues.

Predator Free 2050 – the springboard for protecting threatened species (page 2)

Comment – The sub-heading “the springboard for protecting threatened species” is misleading. Many threatened species are currently protected and the population declines of several species have been reversed. Thus, the threatened species strategy builds on other significant national conservation initiatives (see page 18). We would suggest that a more accurate title to this section would be “Predator Free 2050 – the springboard for developing a threatened species strategy”.

Comment – The CBB acknowledges the importance of Predator Free 2050 to conservation in New Zealand, and that it is a fundamental platform for the work to protect many native species. However, we consider that it should be noted in this section that, if successful, Predator Free 2050 will halt the decline of species threatened by predation by rats, stoats and possums, including birds, invertebrates, reptiles, and native plant species currently impacted by possum browsing. The document notes that Predator Free 2050 “needs to be part of a broader suite of actions”. We consider that this should be expanded to include the phrase “to address species subjected to threats that are not related to mammalian predators”.

## **The Strategy**

### **Vision (page 4)**

The TSS “aims to safeguard vulnerable threatened species”; “establishes clear goals for increasing the number of threatened species we are working on”; and “prioritises some threatened and at risk species for intensive management to set them on a path to recovery by 2025”.

Comment - The vision statement, as written, is vague. It should define the success of the threatened species strategy at a specified future date and include measurable

outcomes. Thus, the commitment in the preceding section to increasing the populations of 150 threatened species by 2025 and actively managing 600 threatened species by 2030, could be incorporated in the vision statement. The integration of the Māori world view into species recovery programmes by 2025 could also form part of the vision statement.

### **Focus** (page 4)

Comment – The subject matter covered in this section and the “strategic themes” section (page 32) is similar so we would recommend that the same heading should be used. Based on the content, “strategic themes” would be preferable.

The strategy is based on five themes necessary for progress on threatened species conservation:

Uniting against invaders at the landscape scale;

Managing ecosystems at a scale to protect species;

Building the science and knowledge base;

Focusing beyond public conservation land;

Working together in partnerships.

Comment - We suggest that the fourth theme should be expanded “to include threatened species on privately owned land, and in freshwater, coastal and marine environments”.

We would also suggest that this section should come after the section on goals (page 5) which would be consistent with the order of these sections further on in the document.

### **Goals** (pages 5 and 28)

Manage 500 species for protection by 2025 – a 40% increase on today – and 600 species for protection by 2030

Comment – ‘threatened’ should be inserted between ‘500’ and ‘species’.

Enhance the populations for 150 prioritised threatened and at risk species by 2025

Integrate Te Ao Māori (the Māori world view) and mātauranga Māori (Māori knowledge) into species recovery programmes by 2025.

Support research particularly through the National Science Challenges, that helps us to better understand data deficient species

Comment – This should state “Support research that helps us to better understand data deficient species”. The options for achieving this goal, such as the National Science Challenges, are outlined on page 35 of the strategy document.

Comment – The need to work in partnerships on conservation of threatened species is recognised throughout the document, but particularly in the Focus (page 4) and Strategic Themes (page 32) sections. We consider that this should be a stated goal. We suggest there should be a fifth goal that supports and facilitates partnerships between DOC and businesses, local communities and conservation groups to conserve threatened species and their habitats.

### **The right tools for the job** (page 20)

Comment – We consider that this section gives a comprehensive summary of means by which conservation of threatened species can be achieved. However, we would recommend that ongoing monitoring of species and populations should be included as part of the toolkit. This would provide data on both the success of the management strategies for threatened species, and information on population trends for other species to enable quick action should populations start to decline.

### **150 priority and at risk species** (pages 31 and 42)

One hundred and fifty threatened and at risk species have been selected by DOC to focus initial efforts. These comprise 50 notable, iconic species that are currently being managed, with an additional 100 species selected based on scientific criteria.

Comment – We recognise the difficulty in devising such a list, and agree with the criteria for selection of the 100 priority species.

However, we note that birds are over-represented in the notable species group, some are not recorded at an appropriate taxonomic level (e.g. kākā are listed twice with both subspecies listed) and some species are not in high risk threat categories. We consider that it would be useful to list the basis for selecting each of the notable



species and how these have been prioritised. Consideration should be given to reducing the number of notable species, and increasing the number of priority species that are selected using more objective, defensible criteria.

**Top 10 actions** (page 40)

Comment – We consider that the top 10 actions to achieve the goals of the threatened species strategy should be clearly related to each of the goals (see pages 5 and 28).

Thank you for the opportunity to comment in person to the strategy team; these comments are in support of that discussion.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 11:14 a.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Email: [REDACTED]

q1: No . . . because every species is precious and there is no consideration of the balance of the whole eco-system and thus this strategy will do more harm than good.

Besides you only have provision to include those who agree with you and this will continue to alienate and exclude those of us who will not be part of any strategy that inflicts harm on other species in a cruel and unnecessary manner - and worse glorifies and lauds the killers and teaches children that this is desirable - i.e breeds psychopaths and injures a child's natural capacity for love and compassion.

q2: AS above . . . the focus needs to shift from artificially trying to put a greater value on one species rather than another . . . and this is all weighted towards a false vision of what Aotearoa was before . . . reestablishing the pure pristine forest and selecting species of most value to protect and foster . . . there need to be studies done on what is the most ecologically sound vision which includes species now endemic in NZ.

q3: No . . . because the studies have not been done on how deer and possums and other 'exotic' species may be beneficially filling niches left by the moa and other now extinct species.

q4: No . . . Predator Free 2050 is totally unachievable unless the whole country is napalmed - and even then a rat will survive - or GE is employed thus destroying the premium we now (falsely) enjoy on exports from 100% Pure Clean Green NZ; The Battle for the Birds has seen kea devastated, the rock wren almost disappear while conferring an advantage on the rat population which recover far faster from the torture and cruel deaths that 1080 and brodifacoum etc inflict.

The War on Weeds is having a similar devastating effect on the micro biome of the soil and could well be contributing to the spread of Kauri dieback disease as these killer chemicals are easily transported by water whilst the strategy is concentrating only on the soil borne fungus, with considering how the plants' natural defences are weakened by glyphosate, 1080, brodifacoum etc.

q5: Change your focus from EGO to ECO and utilise non-toxic methods that enhance the whole ecosystem backed up by unbiased observations and studies to carefully select where human intervention may do the least harm.

q6: No . . . these goals are presupposing that NZ's native species and the human enjoyment of such are the prime considerations when the survival and health of the whole damned ecosystem is far more important.

We support integrating the Maori world view and knowledge into any ecologically sound programme - but as it stands today have observed that it is more about bringing iwi around to agree with your spurious goals and vision. Totally support research but it must be unbiased and have independent assessment - taking into account ALL the dissenting views rather than ridiculing and penalising anyone who dares raise a better not consistent with the current dogma.

q7: Adjust your vision first:

the goals will follow 'organically':

best to start with the overall health of the ecosystem and at the ground level of health of the soils and waterways:

measure for contamination and reduce urgently:

implement ways to activate the soils and waterways as organic farmers have traditionally done:

use non-toxic and humane ways to control any species only where there is a compelling need identified:

ASSESS progress by the overall health and vitality:

by the reduction in contamination:

by the increase in activity of the micro biome of the soil:

The earth is meant to be covered in a green mantle, supporting a great diversity of life - it is counter-productive to target one species, or one aspect, without considering the effect on the whole.

q8: No:

WE should not be engaging in 'War against Nature' - these 'invaders' are merely filling niches that we regard as 'undesirable' - we need to be working with nature:

and 'managing ecosystems' at a scale for overall health and vitality:

not to merely protect one species at the expense of so many others - and often at great cost to human health:

Building our science and knowledge base - so long as it includes ALL the studies and observations and not just those from you hacks.

Would be great to work in partnership but FOS are horrified when alongside people who glorify killing and torture animals and teach children that that sort of psychopathic behaviour is OK because it's against invaders that are 'bad' - too easy to transfer to anything else they don't like and unbelievable to be occurring in a so-called civilised society . . . SHAME ON YOU ALL!

q9: Can't find them - but probably not since they will no doubt involve increased amounts of highly toxic compounds like 1080, brodifacoum, pindone etc and be softening the public up for the introduction of GE through the back door - I can just hear the Minister of Conservation now . . . 'It's the only way we can save the kiwi' etc and convincing the next foreign politician that Predator Free 2050 is 'cruelty free' so they splutter ' . . . they die with a smile on their faces!

How crass is that?

q10: Since I can't find these actions FOS can only assume that they include the continued and increasing use of 1080 and other highly toxic chemicals and inhumane methods - these should be removed before we totally lose face with the international community.

Any thought of using GE methods should be dismissed since that also would impact so severely with our overseas exports that presently enjoy a premium if 'organic'.

Any short term fixes that damage long term prospects for overall improvement should be dropped.

q11: too few

q11comments: The whole ecosystem needs to be the priority!

q12: No . . . as above.

q13: the basis of health of the whole ecosystem, as even Cleopatra knew, is the humble earthworm . . . and in fact the whole micro biome of the soil . . . if you keep destroying that with ever increasing amounts of toxic chemicals like 1080 & brodifacoum and then pollute it forever with GE, there is little hope of any species surviving your strategy - including humanity.

q14: No . . . you are destroying our country!

q15: All while you continue to ignore the dissenting voices and fail to take into account the overall health and vitality of the whole ecosystem you will only do more harm than good.

Very sad to see you PR machine pulling the wool and maintaining success in the face of abject failure.

The truth will out - we just hope in time to truly save our iconic species as well as the rest of the ecosystem . . .

have you not noticed the degradation of our waterways and considered how much worse that is from your contamination that is destroying the very stuff of life?

# New Zealand's Threatened Species Strategy: submissions for consultation

#105

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

---

### Submitter details:

Name of submitter  
or contact person:

[REDACTED]

Organisation name:  
*(if on behalf of an organisation)*

Botanic Gardens New Zealand Australia

Email:

[REDACTED]

Signature:

*(we accept a typed signature if  
no electronic signature)*

[REDACTED]

## Submission:

Botanic Gardens New Zealand Australia (BGANZ) represents interests of botanic gardens in Australia and New Zealand. New Zealand members include the major botanic gardens in Auckland, Wellington, Christchurch and Dunedin as well as three public gardens that provide similar services: Pukekura Park (Taranaki), Eastwoodhill Arboretum (Gisborne) and Hamilton Gardens.

Botanic gardens play a key role in plant conservation worldwide and most NZ members of BGANZ are also members of Botanic Gardens Conservation International (BGCI). Our framework for threatened plant conservation is the Global Strategy for Plant Conservation (GSPC). The GSPC is a program of the UN's Convention on Biological Diversity and seeks to *halt the continuing loss of plant diversity* through 16 targets.

Threatened plants are only protected when they occur on a reserve as they are not legally protected. Many do not occur on reserves, and even if they do the threats to them are unmanaged. Currently managers of threatened plants (owners of land where threatened plants grow) do not formally work together or coordinate their work so there is no 'national picture' of the management of threatened plants in NZ. As a result DOC and BGANZ have started working together on a national ex-situ strategy for plants to link Iwi, Councils, Botanic and Public Gardens, DOC, horticulturalists and private land owners or important stakeholders such as NZPCN and community groups. We think this will offer opportunities for involving more people, increase seed banking, numbers of insurance populations in gardens, return to the wild projects, research, training and education.

As part of the ex-situ strategy work BGANZ offers DOC our skills and resources including a nationwide network of gardens to grow and store plants, expert plant propagators, gardeners and botanists, nursery facilities, education programmes and resources such as databases and our own volunteer networks. In addition we think we offer DOC a 'shop window' for plant conservation to our one million visitors per year (at most major city Botanic Gardens).

## You can answer all or some of the questions.

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

DOC and Botanic Gardens staff are in the process of collaborating to write an ex-situ strategy for threatened plants in NZ. We are midway through national workshops discussing how we, as a botanical community, can contribute to the recovery of New Zealand's threatened plants. The working title is a "National Strategy for Ex-Situ Plant Conservation" and our (working) vision is that:

*"New Zealand's threatened plants are being secured from extinction through conservation programmes that engage communities who have the people, tools, knowledge and awareness to contribute effectively".*

The vision for the draft ex-situ strategy, and the way we think a vision in a strategy should be expressed, is succinctly so it is memorable. It should also be aspirational, looking to a future state which we know we have the technology and skills to achieve, but perhaps not the funding

and coordination just yet. The vision in the draft is more like a statement and we recommend it is revised.

2: Are there additional aspects that you think should be included in the vision?

The vision from the GSPC communicates the critical role plants (and all biodiversity) plays in supporting life, a fact that resonates with people and demonstrates that conserving plants (biodiversity) is not optional: *"Without plants, there is no life. The functioning of the planet, and our survival, depends on plants. The Strategy seeks to halt the continuing loss of plant diversity."*

3: Do you agree with the characterisation of the value and current state of our native species?

Yes

4: Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?

Firstly we are pleased to be referred to in this section. Lack of coordination between agencies working in plants conservation has been a barrier to plant recovery in the past. We are looking forward to a collaborative and successful partnership with DOC (and between our partners and yours) as part of the ex-situ strategy work we are midway through and believe that will enable a step-change in the way plants have been managed to date.

However not all management techniques for animals and ecosystems can be assumed to be beneficial for plants too. Some of the tools mentioned may also increase the threats to plants. Fenced sanctuaries, for example, in eliminating threats to animals can inflate the numbers of predators to plants (snail numbers for example are released from predation pressure by rat removal). Exclusion fences around peninsulas enable plant pests such as rabbits to enter (at low tide) and they prosper in the absence of competitors and predators.

We support Recovery Groups as structure to collaborate on species recovery. The *Dactyloctenium aegyptium* group is one plant example we know of that has resulted in an increase in security of populations. For species where experts reside in Botanic Gardens, or for those where a significant ex-situ effort is required, we encourage DOC to involve BGANZ in these groups. Currently there are four times as many animal recovery plans to plant recovery plans and we would like to advocate for a more even-handed approach. Plant conservation must be equitably funded.

5: Are there other tools we could use to help us achieve the vision?

The threats to plants are not primarily the 'dirty dozen' weeds nor the predators to animals. The techniques for plant recovery (management or 'tools') are diverse and sometimes quite specific to one species. In some cases it might be the control of another native plant, the acquisition of land, disturbance (e.g. fire) or the maintenance of grazing by stock. We also recommend the use of "pest plant" or "environmental weeds" to refer to plants which adversely impact on native ecosystems as "weeds" is ambiguous and is used in the community to refer to gardens and tidiness. We advocate that the language in the strategy be analysed carefully to ensure it does not exclude plant conservation.

The Threatened Species Recovery Hub model in Australia should be investigated as a tool to fund, promote and collaborate on research for threatened species.

#### 6: Will the proposed goals help us achieve the vision and assess our progress?

Goals 1: Landscape scale predator control should also include specifically mentioning management of threats to plants (which are not mainly the dirty dozen weeds or the predators of animals). Perhaps this could be re-worded as “landscape scale initiatives”. Prioritising threatened habitats for landscape scale conservation management is critical to achieve this. Generally speaking most threatened plants do not grow in forest habitats which are usually the target of landscape scale control for bird protection.

Goal 2: We recommend more clarification around the meaning of “enhance” in the final strategy for example is this recovery to self-sustaining wild populations (a more lofty goal), or securing from extinction (e.g. seed banks or living collections)? Please refer to our response to Q12 for more feedback on this goal.

Goal 3: We support the goal to integrate the Maori world view and Maori knowledge and we implore DOC to develop relationships to enable partners to assist with species recovery. Currently the slow speed of consultation risks further endangering plants.

Goal 4: We support research and citizen science to improve threatened plant recovery. Botanic Gardens are well-placed to support and encourage citizen science for example as hubs for the community for education, support and training. We advocate equitable funding for plant conservation research.

#### 7: Are there alternative goals that you think will better achieve the vision and assess our progress?

The global framework for threatened plant conservation is the Global Strategy for Plant Conservation (GSPC) a program of the UN's Convention on Biological Diversity (NZ is a signatory). The GSPC was endorsed by the United Nations Convention on Biological Diversity (CBD) in 2002 and in 2010 as the framework to measure and report on progress in plant conservation internationally, and New Zealand should align plant conservation goals and report internationally on progress towards the 16 targets of the GSPC.

#### 8: Have we identified the right strategic themes?

We support the approach principles outlined in the five themes. We note however, in relation to ‘working in partnership’ that difficulties in obtaining permissions from DOC to access plants for the sole purpose of preventing them from extinction is a barrier to plant conservation.

#### 9: Do you agree with our top 10 actions?

Currently only one method of plant conservation is included in the top ten actions, seed banking. Seed banking in itself is not a recovery method for plant populations. It must be coupled with in-situ protection and other effort such as research. Seed banking is also not just a back-up in case of disaster but a science which results in practical skills and understanding to enable recovery programmes to partnered alongside and contributing to in situ conservation efforts. Further not

all seeds are able to be banked (recalcitrant seed may make up 40% of NZ flora) requiring tissue culture, live (wild and captive) collections and seed orchards to ensure their survival. The strategy must acknowledge that seed banking needs to be complemented with horticultural, botanical, restoration research and practice.

We completely support seed banking as an important method of plant conservation but note currently the New Zealand Indigenous Flora Seed Bank is a partnership not a fully funded, staffed, seed bank. Ideally New Zealand has a similar institution to Australia's PlantBank. BGANZ are committed, and are currently fully funding, the backup storage collection for seed in NZ.

10: Are there any other actions that should be included, and any actions that should be removed?

We recommend the targets of the Global Plant Conservation Strategy are included in the top ten actions.

11: Have we identified the right number of priority species?

We understand a computer algorithm is used on a subset of threatened species, those that need enhancement and can be managed which seems a sensible approach. It is less clear to us, because we not familiar with the algorithm or the raw data, whether the algorithm has produced 'the right number' list of priority species. We accept prioritisation is necessary as managing all threatened species is not workable if current funding levels stay the same or decrease and if partnerships cannot be effectively mobilised to assist.

### **Comments:**

Prioritising threatened habitats, instead of species, may be more useful as a prioritisation method. We did not identify, for example, many wetland species on this list. We believe a threatened species strategy should include more of focus on threatened ecosystems. Threatened plant recovery in the wild relies on the ecosystems within which they exist and the health of those ecosystems. How does the strategy address the causes of decline rather than being the ambulance at the bottom of the cliff?

We believe the BGANZ/DOC partnership is crucially important here because studying and conserving threatened species is a clear goal of Botanic Gardens and we employ horticulturalists with the understanding and skills to collect material, grow plants, and answer technical questions to support recovery efforts. We are almost all part Local and or Regional Councils with direct responsibility for managing land with threatened plants on them and managing legislation to protect populations on private land. We look forward to the results of our partnership, currently in the phase of working with local communities in each region, working towards a NZ ex-situ plant strategy.

12: Have we identified the right priority species?

The top 50 priority list in the draft strategy includes 7% of all birds, 63% of the marine mammals and 2% of all plants in NZ. Non-vascular plants and fungi are absent. The lack of plants on the list leads us to question whether social value should be the method of prioritising threatened



species management. If a species is not well known it will never be socially important. Plant Blindness is a well-described phenomenon. People do not connect with plants as well or as easily as with animals. This should not deprioritise plants for conservation work. In addition there are more plants than animals so by default they are less well known. Conservation in NZ has traditionally focussed on animals, bringing less attention by the public to the plight of plants. The role of plants is to provide food, shelter and support to the charismatic animals that have the “notable social” values. The disproportionate focus on animal species to date in NZ conservation has resulted in imbalances in laws, policies and in strategies which further de-emphasise plants, further decreasing their social value and in this model de-prioritising them for conservation.

We recommend that before being used as the primary way to prioritise funding that the algorithm used to select species is published in a peer reviewed journal. There are scientific papers (e.g. Mazel et al. 2017<sup>1</sup>) which cast doubt on the concept the algorithm is based on (Faith, 2014).

13: Do you think other species should be prioritised ahead of the ones listed? And why?

Public affection for one species of plant or animal over another should not be the way conservation management is prioritised by the national conservation agency responsible for the preservation of biological diversity in a world biodiversity hotspot.

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

(Taken together) the strategy should not sit alone but we are not clear how this strategy will be implemented at DOC, or integrated into Council programmes (half of the threatened plants in NZ do not occur on reserves managed by DOC). The hierarchy of documents is unclear. Where does the Threatened Species Strategy fit with the NZ Biodiversity Strategy and New Zealand Biodiversity Action Plan for example. How will it be implemented? What effect will the strategy have for mangling plants on private land?

15: Do you have any further comments regarding the draft Strategy that is not covered above?

The existence and impact of climate change is not covered in the strategy yet range shifts, changes in pest abundance, and increases in severe weather events are clear threats to plants. We are particularly concerned for coastal plants that are constricted by coastal development with have no place to migrate, and alpine plants that may also lose their habitats. We do not expect the strategy to address climate change but it is a contributing factor to success or failure for recovery. Recovery actions for plants in these habitats requires partnerships with Local Government and perhaps legal mechanisms not canvassed in the strategy. The uncertainty climate change brings further emphasises the need to fund specific seed banking facilities in NZ.

Overall we support any initiative to increase the security and prevent the extinction of plant species in NZ. We believe more coordination is needed for plant conservation and

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<sup>1</sup> Mazel, Florent, et al. "Conserving Phylogenetic Diversity can be a Poor Strategy for Conserving Functional Diversity." *Systematic Biology* (2017).

look forward to completing the current collaborative project between DOC and Botanic Gardens to consult with our local communities on an ex-situ strategy for NZ. We recommend the section acknowledging our relationship also mentions this work. As a network of Botanic Gardens in NZ we reiterate our support and commitment to partnership with DOC in order to achieve this. We support any work towards reducing legislative and administrative barriers to gardens participating in plant conservation.

31 July 2017

Threatened Species Strategy  
Department of Conservation  
PO Box 10420  
Wellington 6143  
[threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Christchurch City Council staff submission on the draft Threatened Species Strategy

### Introduction

Christchurch City Council staff thank the Department of Conservation for the opportunity to make a submission on the draft Threatened Species Strategy.

If you require clarification on the points raised in this submission or additional information, please contact [REDACTED]

### Submissions

#### 1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

The vision is to safeguard New Zealand's vulnerable threatened species. As "vulnerable" is also a term used to describe the threat status of threatened species, we assume "vulnerable" to mean the most vulnerable of existing threatened species, i.e. those 500-600 species listed. To avoid confusion of the use of the term "vulnerable", we submit that the vision statement be consistent with the purpose:

- *To halt the decline of our threatened species and restore them to healthy populations.*

#### 2. Are there additional aspects that you think should be included in the vision?

A vision is a statement that describes a desired future state, which is maintained or changed due to the actions undertaken to achieve the objectives and goals. The Strategy's vision statement summarises the actions undertaken to achieve the objectives and goals, rather than a proposed future state. The vision and focus appear to be a mix of a desired future state and an approach or action plan with Predator Free 2025 forming the basis of engaging communities to protect threatened species everywhere in New Zealand, irrespective of land tenure.

The Strategy is underpinned by science, action and partnership. The "ethic of partnership" of the vision should be all encompassing, and supported with opportunities for skilled partnership. We submit that in the third paragraph of the vision on page 4 is amended by adding:

- *This Strategy is underpinned by science, action and an ethic of partnership....role.*

*Science underpins all species management, irrespective of conservation status. Science based management is the key to species recovery. By using evidence-based decision making, and*

monitoring the results of specific management techniques, best practice and cost saving techniques are developed. Science is at the core of threatened species recovery, whether in-situ or under ex-situ management.

### **3. Do you agree with the characterisation of the value and current state of our native species?**

Yes - The Strategy identifies the priority threatened species, the right tools for the job, and the actions needed. The characterisation of the value and current state of native species is well described in “Our Unique New Zealand”, “Trouble in Paradise”, and “The State of our species”. The value of native species is largely intrinsic, although some (e.g. those that are sustainably harvestable) also have utilitarian value.

### **4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

The “right tools for the job” are listed as Planning, Prioritisation of species, Recovery, Captive management, Fenced sanctuaries, Botanic Gardens Partnerships, Seed Banking, Biocontrol, Biosecurity, Translocations, Regulation. The “right tools for the job” could include many others that are described elsewhere in the Strategy e.g. quarantine, offshore island management, legislation, strategic partnerships, specific management, broader partnerships with non-governmental organisations and communities, and volunteering. One example is that pest control is identified as critical to the success of the Strategy, but is not identified as a “tool”.

Recovery Plans are the best way of identifying risks, such as pests, and appropriate actions that take local variations etc. into account. Recovery Plans also provide guidance to communities and other groups to adopt for their local area. There are about 20 threatened bird species breeding in Christchurch that have a threat conservation status of which none have a recovery plan, and one threatened species that does.

While the Threatened Species Strategy may rely on MPI to regulate pest control, for example, that does not mean that the Biosecurity 2025 is part of the Threatened Species Strategy, or vice versa. The Biosecurity 2025 project is written by the Ministry of Primary Industries (MPI) under the Biosecurity Act 1993. The Threatened Species Strategy is written by the Department of Conservation under the Conservation Act 1987.

Additionally, it is not clear how the “right tools for the job” are funded.

We submit that the Strategy:

- *Establishes a clear relationship between the focus, themes, goals, right tools for the job and top 10 actions.*
- *List the top 10 actions as subsets of the right tools for the job, for example:*
  - *Research – data bases, recovery planning, prioritisation of species, translocations*
  - *Actions – captive management, recovery, fenced sanctuaries, seed banking, pest control*
  - *Partnerships – community, agencies, businesses, Botanic Gardens, Maori.*
- *Remove the words “As such the Biosecurity 2025 project is a vital part of this Threatened Species Strategy”.*
- *Lists legislation that is important to the implementation of the Strategy.*
- *Identifies the financial commitment of the government for undertaking the right tools for the job.*
- *Commit to Science and Research funding within the Department of Conservation.*

## 5. Are there other tools we could use to help us achieve the vision?

The right tools (outputs) will achieve the vision (outcomes) when there is a clear link to measurable outcomes of a desirable future state of the 150 priority threatened and at risk species. We submit that tools include:

- *spatial data management and reporting.*

## 6. Will the proposed goals help us achieve the vision and assess our progress?

To provide clarity between science funding within the Department of Conservation and science funding through the National Science Challenge, we submit that Goal 4 is amended to read:

- *Support Department of Conservation in-house research that helps us better understand threatened species, including data deficient threatened species.*

## 7. Are there alternative goals that you think will better achieve the vision and assess our progress?

No.

## 8. Have we identified the right strategic themes?

Three of the five themes relate to partnership. To remove what we assume to be an unintended bias of the Focus of the Strategy, we submit:

- *that the Focus state the broader three themes: science, action (managing ecosystems...) and partnership (uniting against invaders, focussing beyond conservation land, working in partnership).*
- *each of these three themes be described in more detail as sub-headings within the revised Strategy.*
- *each of the three themes of the Focus include an outline of principles for prioritisation.*

### *Uniting against invaders on a landscape scale*

The theme “Uniting against invaders on a landscape scale” is dominated by pest control of mammalian predators, particularly Predator Free 2025 and briefly mentions “War on Weeds”. Pest plants, however, may be a greater threat to some species e.g. some threatened plants. To reduce this bias, we submit that the Strategy:

- *Give equal weight to the discussion of pest plants and pest animal control.*

### *Managing ecosystems as scale to protect species*

While we support the ecosystem approach, it would be beneficial for groups wanting to undertake conservation work to know the location and extent of ecological management units. We submit that the Strategy:

- *provides a map or a link to a map of prioritised ecological management units.*

## 9. Do you agree with our top 10 actions?

Action 1: Predator Free 2025 Goals - We do not support Action 1. This action confuses the relationship between actions and goals. It is the purpose of Predator Free 2025 to achieve its own goals.

We submit that:

- *Delete Action 1*

Action 2: Tools and techniques for predator control - We support Action 2.

Action 3: A priority list of plant species for seed storage - We support Action 3 in part. Action 3 partially achieves the Global Strategy for Plant Conservation 2011-2010. The purpose of seed storage is to ensure that a significant percentage of seeds is readily available for recovery programmes to enhance wild populations. Seed storage, as described by this Action, is not an end in itself. This omission within Goal 3 is corrected in part by the discussion under "Seed banking: ..." (page 22), but even here the Strategy seems to suggest that seed banks be used only when disaster strikes e.g. "Catastrophic event wipe them out in their natural range".

Action 3 states "Identify a priority list of threatened and at risk.....recognised seed storage facility". A priority list of threatened species may only need to consist of one or two species, however, this action appears to underpin the "success" of Goal 1 of the Strategy – a 40% increase (200 species) in species for protection.

We submit that Action 3 states:

- *At least 200 threatened plant species have recovery plans that have seed storage as an integral part of wild population management, and that seeds of those species are held in sufficient numbers within a recognised seed storage facility to ensure their long term ex-situ and in-situ survival.*
- *Research into seed storage, propagation and translocation is supported.*

Action 4: Biosecurity - We support Action 4 in part. The relationship between Biosecurity as a "right tool" and an Action is unclear, as is the relationship between Action 1 and Action 4.

The description needs to make clear that the Department of Conservation has a partnership role with MPI, a role in biosecurity to protect threatened species, e.g. quarantine with respect to island management, and as a landowner and Good Neighbour under Regional Pest Management Strategies.

As pest management is an important tool, what the Department of Conservation does or intends to do where to protect threatened species needs to be made clear.

We submit that Action 4:

- *Delete "Biosecurity 2025"*
- *Amend to state "Integrated pest plant and pest animal control will be undertaken to protect threatened species".*

Actions 5 and 6: Regulatory reforms and Freshwater reforms - Actions 5 and 6 both refer to regulatory reforms which are also "right tools". The relationship between regulation as a "right tool" and an Action is unclear. Assuming regulation is an Action and not "a right tool", we submit that:

- *Actions 5 and 6 are combined*
- *A description clearly outline what the Department of Conservation intends to do with respect to regulatory reforms that would benefit threatened species.*

Action 7: Threatened species hotspots - We support this Action. We submit that:

- *the relationship between Action 7 and one of the Goals be made clear.*

Action 8: Research on some of 500 data deficit species - We support this Action, provided it is not limited by being funded solely through the National Science challenge. We note that this action has already been achieved as the Department of Conservation has a list of 500 data deficient species. We submit that Action 8 be amended to state:

- *To carry out research that describes the taxonomy and life history characteristics of 500 data deficient species by 2025.*

Action 9: Recovery Plans that integrate cultural interests - We support this action in part. As the Department of Conservation has strong existing partnerships with Maori, and efficient systems for recovery planning that are fit for purpose, this Action describes “business as usual”. The Strategy needs to provide a measure of its success by stating the number of species and number of Recovery Plans that are currently in place. An achievable gain would be to increase the number of recovery plans and/or the number of species within recovery plans. As the Strategy appears to strengthen the recovery of threatened plant species through seed storage, propagation and translocation, increasing the number of threatened plant recovery plans is an achievable target.

We submit that Action 9 states:

- *There are 20 more recovery plans and 200 more species protected by recovery plans by 2025.*

#### **10. Are there any other actions that should be included, and any actions that should be removed?**

We submit that the Strategy includes the following actions:

- *Promote national standard monitoring measures through the Inventory and monitoring toolbox.*
- *Secure and strengthen threatened species recovery on offshore islands.*

#### **11. Have we identified the right number of priority species?**

The species listed all appear to have active recovery plans or be part of existing ex-situ cultivation. The Christchurch Botanic Gardens cultivates and will increasingly secure in ex-situ storage, study, and cultivation of *Olearia adenocarpa* (small-leaved tree daisy) which is listed in the Strategy and *Gunnera arenaria* (locally extinct), *Leptinella nana* and *Myosotis lytteltonensis*, which are not listed in the Strategy. *Olearia adenocarpa* has a recovery plan. *Leptinella nana*, *Myosotis lytteltonensis*, *Urtica perconfusa*, *Carex inopinata*, *Tmesipteris horomaka* (an epiphytic fern), *Daucus glochidiatus* (a native carrot), *Anogramma leptophylla* are all threatened Christchurch Plants that do not have a recovery plan.

While it is practical to divide the species into 50 ‘notables’ and 100 ‘selected’ using scientific criteria, there are whole groups not included or that get only a passing mention, such as fungi, compared to, e.g. kauri die-back in its own section. Possibly there is a knowledge gap that prevents threatened fungi (and other taxa) from being identified and named, but we have the science to be able to identify and monitor these.

We submit that:

- *Threatened fungi (and other taxa) are included in an additional section.*

#### **12. Have we identified the right priority species?**

The Strategy has a tone and uses terms that are “catchy” and currently in the media e.g. “dirty dozen”, “Pest Free 2025” instead of consistent, specific terms such as “pest plant and pest animal control”. While possibly appealing to non-experts, the Strategy appears to endorse the prioritisation of threatened species, threats and actions by popularity instead of by risk based on scientific evidence. If this is the case, it leaves the decisions for what is important to partners without necessary skills or capacity.

We note that *Gunnera arenaria* is not recognised as a distinct species in the Landcare Research database, but that the Department of Conservation lists it as a species 'At Risk Declining'. The importance of taxonomic research cannot be underestimated, but appears to be a gap in the Strategy.

**13. Do you think other species should be prioritised ahead of the ones listed? And why?**

There are several threatened plants in Christchurch and many more in the Canterbury Region that urgently need the protection that ex-situ conservation can provide should in-situ conservation prove inadequate. In addition, there are local rare species that the Strategy does not recognise. In Christchurch, for example, we have put considerable effort into recovering *Spinifex hirsutus* on our local dunes as it had disappeared from here, yet cities in the North Island might find this strange and certainly would be unlikely to do the same. The opposite for the native climbing aniseed *Scandia geniculata* which is common locally but rare in the North Island.

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

The proposed vision, focus, themes, goals and actions identifies a tension between the existing science based threatened species recovery programmes, community partnerships and wider environmental issues, without explicitly stating this. The Strategy appears to be modelled on the Australian Threatened Species Strategy, which includes the recovery of threatened ecosystems.

To increase the number of threatened species that are managed, the future direction of the Strategy appears to be focussed on education, advocacy and ex-situ conservation of threatened plants through partnerships with Botanic Gardens. If this is the case, it needs to be stated.

We submit that:

- *Threatened ecosystems be included in the Strategy.*

The Christchurch City Council is committed to continuing to work in partnership with the Department of Conservation to support threatened species recovery, but are unsure as to how the Threatened Species Strategy provides any gain beyond the status quo.

Yours faithfully



Brendan Anstiss  
General Manager Strategy and Transformation  
**Christchurch City Council**



# New Zealand's Threatened Species Strategy: submissions for consultation

#107

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
*(if on behalf of an organisation)*

Email:

Signature:

*(we accept a typed signature if  
no electronic signature)*



**Submission:**

**You can answer all or some of the questions.**

**1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

*No – This vision lacks ambition when it comes to protecting our threatened and at risk native species. It needs to honour New Zealand's international commitments;*

*To restore viable populations of all our threatened and at risk species across their natural range and maintain their genetic biodiversity.*

*This could be encapsulated by a vision based on that recommended by the Parliamentary Commissioner for the Environment's recent Report on the state of our native birds.*

*“The restoration of abundant, resilient and diverse species and habitats across their natural range.”*

*To achieve this, the Strategy's vision needs to be much more ambitious than just aiming to safeguard 20% of our threatened species by 2030. Like Predator Free New Zealand it needs to aim high and look to safeguard all our threatened species by setting clear goals for significant increases in the number of threatened species that will be actively managed for their restoration; i.e.:*

- **All** threatened and at risk species will be protected, not just 20% of them, and
- **All** threatened and at risk species that are conservation dependent will be under intensive management setting them on a path to recovery.

*The vision for Predator Free NZ by 2050 – is supported.. This needs to be expanded to include the other key introduced predators, especially mice, ferrets, weasels and feral cats.*

*“Battle for our Birds” is supported but needs to be expanded so that all of the public conservation land needing predator control is under regular sustained predator control. This would only cost around \$50 million a year (based on roughly 7million ha receiving control once every 3 years with an average cost of \$7 per ha).*

*Until we have eradicated all introduced predators we need to make sure that our threatened species survive and no more species become threatened. To do this we will also need comprehensive, landscape – scale, predator control on land outside of the conservation estate.*

*The “War on Weeds” also needs to be expanded from the dirty dozen as this is less than 4% of the 350 weeds which currently threaten nature. Weeds such as lupin, broom, poplar and gorse are urgently in need of control in some habitats where there are many threatened species such as braided river beds and lowland dryland sites.*

## 2. Are there additional aspects that you think should be included in the vision?

*The vision should address:*

- *the need to halt the loss of habitats that support threatened species*
- *Increased emphasis on improving our knowledge of the threats to, and conservation status of, species.*
- *Actions for threatened marine species.*

*The vision is focused on land based threatened species and actions to assist them, yet there are large numbers of sea birds threatened with extinction as well as dolphins, whales, sealions, marine fish and invertebrates.*

*The vision and actions of the Strategy need to incorporate an all-of-government approach to protecting threatened and at risk native species. The actions (or lack of action) of many government agencies have significant impacts on our threatened species. All government agencies should have a responsibility under the Strategy to ensure that their policies and actions support the restoration of threatened and at risk species.*

## 3. Do you agree with the characterisation of the value and current state of our native species?

*Yes Agree with the value of our biodiversity.*

*The Trouble in Paradise section of the strategy needs to recognise the impact of the commercial harvest of threatened species, such as whitebait species and Long finned eels, and the continued clearance of habitats of threatened species for commercial development such as farming intensification, urban expansion and infrastructure such as motorways.*

*The state of our species section needs to be more specific so that it is clear that for example what percentage of our birds, or reptiles, are threatened, and what the trends are for each group of species.*

## 4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

*The Strategy needs to require that all critically threatened species that would benefit from detailed management plans also have dedicated recovery groups that oversee the production and implementation of those plans.*

*The Strategy places too much emphasis on the need to prioritise the work between threatened species. This emphasis appears to be driven by the lack of resources, rather than conservation need. All threatened and conservation dependent species need to be managed for protection and there needs to be flexibility to be able to work on species that may not have been prioritised, but where an opportunity or a necessity arises.*

*Captive management should only ever be a last resort tool, as the priority for threatened species must be conservation in situ.*

*While Fenced sanctuaries serve a useful purpose, they should not be prioritised over conservation of threatened species in situ.*

*As the Parliamentary Commissioner for the Environment's recent report notes, translocations are expensive and risky and should be evaluated against the overall benefit of the species and against the benefit of using the same resources to control predators, or to provide other assistance in the in situ restoration of threatened species.*

*The development of native threatened plant and habitat protection legislation is supported..*

*Support the adoption of a comprehensive National Policy Statement on Indigenous Biodiversity under the RMA.*

*Support greater use of legislation, regulation and policies to ensure that human actions do not further threaten species, for example zero bycatch of threatened species in the fishing industry, no clearance of threatened species habitats.*

*Development of a National Policy Statement on indigenous biodiversity is supported provided it sets bottom lines for biodiversity protection on private land, that will achieve the vision and the goals needed to protect and enhance all our Threatened and At Risk native species and prevent others becoming threatened.*

## **5. Are there other tools we could use to help us achieve the vision?**

*The best possible tool is to ensure that the Department of Conservation is adequately funded to undertake all the steps necessary to restore all species at risk of extinction and to prevent others from becoming threatened.*

*The government needs to also adequately resource science to identify the threats and agents of decline and develop management prescriptions*

*Tools and resources are needed to ensure the monitoring and enforcement of existing legislation, policies and regulations at the central and regional and local government levels.*

*Utilise the Crown's tenure review process to secure high country threatened species habitats and ecosystems in Crown ownership and control.*

*Greater use of DOC's advocacy functions under resource management and other legislation to halt the decline of our biodiversity and enhance threatened species and their habitats.*

*Regulations are needed to require appropriate bycatch mitigation techniques, and transition to modern, low impact, fishing techniques.*

*The war on weeds needs to be expanded from just 13 of the 350 weeds known to be harmful to nature.*

## **6. Will the proposed goals help us achieve the vision and assess our progress?**

*The proposed goals need to be considerably more ambitious.*

*There are no goals to achieve enhancing all of our threatened and at risk species, or increasing knowledge about the many data deficient species so that no species are data deficient.*

*There is no goal setting out how progress will be assessed and publicly reported.*

*Goal 4 fails to set a target for assessing data deficient species*

## **7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

Amend the goals to include:

- *Enhance the populations of more than 50% of our threatened species so that they are on the road to recovery by 2025,*
- *Manage all threatened species requiring conservation intervention for protection so that no species should become more threatened*
- *All threatened and conservation dependent species should be actively managed for recovery by 2030.*
- *Reduce by kill of threatened species to ensure recovery to non threatened status*
- *Select 230 data deficient species every year so that by 2030 there are no data deficient species.*

## **8. Have we identified the right strategic themes?**

The following additional themes should be included:

- *Uniting all Government Agencies in an “all of government” response to threatened and at risk species to ensure all native species thrive.*
- *Maintaining genetic diversity and creating resilience*

## **9. Do you agree with our top 10 actions? -**

*Yes with additions and amendments, as set out below.*

**10 Are there any other actions that should be included, and any actions that should be removed?**

*In addition to achieving the Predator Free 2025 goals and the Battle for our Birds response to maasting events,*

*Increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control.*

*Develop a portfolio of priority areas for sustained and effective predator control beyond public conservation lands.*

*Amend Action 7 to; Develop and publish a portfolio of priority areas for threatened species protection on private land.*

*Amend Action 8 to select 1000 rather than 500 of the 3000 data deficient species for assessment.*

*Amend Action 9 to ensure that national recovery planning systems are not only fit for purpose but are also timely and implemented to achieve threatened species goals.*

*Add to Action 10 the development of a system for monitoring and regular public reporting on progress towards the goals.*

*Introduce regulations to achieve zero bycatch of threatened species in fisheries.*

*Expand the War on Weeds to include lupins, broom and willow on river beds and their margins*

*Add an action to identify and take opportunities to preferably purchase, or covenant habitats of threatened species.*

**11. Have we identified the right number of priority species?**

(Circle or highlight one)      • Too many      • About right

• Too few

**Comments:**

*The number of threatened species identified needs to be driven by what is actually required to safe guard our threatened species and ensure that their populations are resilient and thriving rather than fitting the prioritisation to the current lack funding.*

**12. Have we identified the right priority species? No**

*All the threatened species and those that are at risk and conservation dependent should be prioritised for enhancement by 2030*

**13. Do you think other species should be prioritised ahead of the ones listed?**

**And why?**

*Prioritisation should be dependent upon threat status, with account taken of the imminence of threats and be less influenced by the cost of management.*

*The document should specifically include Pateke / Brown Teal / Anas Chlorotis which is experiencing a concerning decline of the residual natural population on Great Barrier Island / Aotea. A concerted effort to increase DOCs predator control effort is required. There is also a pressing need for dedicated expert research into the reasons for the population decline and concerning health indicators of revealed in the last DOC 15 year Pateke Review (2015) on Great Barrier /Aotea.*

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

*The overall framework is seriously lacking in ambition.*

*The vision, and consequent framework only proposes to increase the populations of 150 out of 800 threatened species at risk of extinction, and manage 600 out of a further 2,200 species at risk of decline. The vast majority of threatened and at risk populations which need help now are not covered by the Strategy's proposals for action.*

*The strategy focuses on terrestrial species, relying heavily on Predator Free NZ, Battle for our Birds and the limited War on weeds. There is a disappointing lack of focus on out shore and seabirds which are also facing significant threats or marine and freshwater species generally.*

*It fails to commit all government agencies to do their bit to meet the strategy's goals, especially for marine species, or commit the government to ensure that all of the public conservation lands needing predator control are under regular sustained predator control, and that there are effective policies and actions to protect threatened species on private land.*

**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 11:49 a.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
Organisation:  
Email: [REDACTED]

- q1: No - sadly the vision is not ambitious enough. We have a challenge ahead but our vision should be bold. All species being threatened need to be included- not just some.
- q2: I think the vision needs to include marine life too.
- q3: Overall yes however the strategy would benefit from more detail eg specifics about what percent of species are threatened. Would be also good to include some trend data where known and indicate where data is insufficient to establish a trend.
- q4: There needs to be a greater emphasis on managing species in situ as this a very useful tool - it can't all rely on fenced sanctuaries etc. I think there is too much attention on prioritising which species to manage rather than having a strategy to ensure there are the resources to manage all species that would benefit from management.
- q5: I think the main tool area to be addressed is overall resourcing for DoC. A lot needs to be done and DoC should be resourced to do it well.
- q6: There is no goal for how progress will be measured and reported. Like the vision I think the goals overall lack ambition. We only get one chance at this - once a species is gone, that is it - so we need to be ambitious.
- q7: I think we need to address the number of data deficient species. Each year we should address some until this issue is resolved. I think the goal has to be that all species are managed for protection.
- q8: overall all yes. Would be good to see the importance of managing genetic diversity recognised in the themes.
- q9: Yes overall
- q10: War on weeds should be extended to include more weed species such as lupins and willow.
- q11: too few
- q11 comments: The priority species need to be decided by conservation knowledge not how many we can afford to prioritise at present- identify them and then make the case for appropriate resourcing.
- q12: No as I believe all the threatened species and all at risk should be prioritised.
- q13: see above, if a species is threatened it is a priority end of story.
- q14: Overall I would like to see a much more ambitious strategy - our species deserve the very best we can do to protect them and support them to survive and then thrive.
- q15:



# New Zealand's Threatened Species Strategy: submissions for consultation

#109

## Once you have completed this form

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## Submissions must be received no later than 5pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter or contact person:	[REDACTED]
Organisation name: <i>(if on behalf of an organisation)</i>	Yellow-eyed Penguin Trust
Email:	[REDACTED]
Signature: <i>(we accept a typed signature if no electronic signature)</i>	[REDACTED]



**Submission:**

You can answer all or some of the questions.

**1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

No, the vision does not extend far enough when it comes to protecting and prioritising our vulnerable threatened species and setting goals to ensure their recovery. Although we agree with the purpose of the strategy to “halt the decline in our threatened species and restore them to healthy populations”, we believe that all threatened and at risk species and their habitats should be included, not just a small percentage.

We agree that support and contributions from other organisations, councils, communities and others are needed and have a role in protecting our species, however we also think that more emphasis should be placed on support and contributions from other government departments including the Ministry for Primary Industries, Ministry for the Environment and Ministry for Business, Innovation and Employment.

The national initiatives at the heart of achieving this vision including, Predator Free 2050, Battle for our Birds and the War on Weeds are supported; however, eliminating predators and weeds should not be the sole focus of the vision if we hope to halt the loss of our threatened species and their habitats.

**2. Are there additional aspects that you think should be included in the vision?**

In addition, the vision should include all threatened and at risk species and their habitats. In particular species that are nationally critical, nationally endangered and nationally vulnerable should be addressed.

Feral cats, ferrets, pigs, hedgehogs, mice and several other land-based predators are currently omitted from the Predator Free 2050 initiative. We believe that all invasive predators should be added so that we can reduce impacts and achieve protection of our threatened native wildlife.

The vision needs to address impacts to native species and their habitats through fishing, mining and other extractive industries, agriculture and urban development.

**3. Do you agree with the characterisation of the value and current state of our native species?**

We agree with the characterisation of the uniqueness and state of our native species, although it makes for pretty sobering reading.

The “trouble in paradise” section again focuses on introduced predators, herbivores and weeds as the major issue for our native species; although this is an issue for much of our native wildlife, anthropogenic impacts including fishing (commercial and recreational), agriculture, water extraction, climate change and pollution also have substantial impacts on many of our species. Whilst many of these impacts are mentioned briefly it appears to be as an afterthought. These impacts are significant and as such require some effective strategies and actions to address them.

**4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

There is too much of a focus on planning, rather than actually undertaking work to achieve the vision. Whilst we understand the need for prioritising effort at sites with many species to maximise effectiveness and ensure efficient use of resources, this is not really a tool for achieving the vision as such. Prioritisation should be based on conservation needs rather than a lack of resources.

Translocations and captive management should be a last resort for safeguarding our vulnerable species. Although some species are suitable for translocation and captive management, this does not apply to all species. In-situ management of species instead of captive management and translocations are much preferred.

Fenced sanctuaries can offer protection to local populations of native species, but they are expensive and require continuous maintenance. Additionally, many species including yellow-eyed penguins are wholly unsuitable for protection within fenced sanctuaries. There is existing research which shows that threatened species can be effectively managed by trapping, rather than within fenced areas and at a reduced cost (Reardon et al. 2012).

Recovery groups and associated plans are necessary to support conservation work and achieve positive outcomes for our endangered species. These groups and plans should provide effective guidelines for conservation groups, landowners, researchers, communities and managers to follow.

Whilst we agree with improving legislation and regulations to support and protect our native species, largely these mechanisms already exist. What is actually required is the provision of protected areas (e.g. marine reserves) at a suitable scale and in appropriate locations which could easily be established under the current legislative system given the appropriate political will.

**5. Are there other tools we could use to help us achieve the vision?**

Prioritisation and commitment of funding and resources for the protection of our species should be included in this strategy either as a tool or elsewhere. There is currently no provision for funding under the current strategy. As a significant drawcard for tourism in this country our wildlife requires substantial investment so that it can be effectively protected into the future.

Research and science should also be added as a tool to identify the threats and impacts to our native species, identify gaps in our knowledge and design effective conservation management strategies to protect them. Science and research should also be resourced to enable this to happen.

Protected areas (both terrestrial and marine) can be used as an effective tool for protecting both our threatened species and their habitats. Such areas would need to be effectively designed so that the scale and location are appropriate for the species and habitat that they are protecting, and could be established under the existing legislation (e.g. as marine reserves, sanctuaries and nature reserves).

Marine and terrestrial extractive industries including fisheries, mining and farming should be regulated effectively to reduce the impacts on our native species. Monitoring and enforcement of the regulations should be part of this tool to ensure effectiveness. Industries should be assisted with transition to other methods which have a reduced impact of New Zealand's wildlife.

## **6. Will the proposed goals help us achieve the vision and assess our progress?**

The proposed goals will go some way to achieving the vision of safeguarding our vulnerable species. Unfortunately, only a small percentage of our species have been highlighted for protection from and management of predators and an even smaller percentage have been prioritised for population enhancement. We cannot achieve a goal of safeguarding our vulnerable species without including all of our most vulnerable species (i.e. those classified as nationally critical, endangered and vulnerable).

We agree that Te Ao Māori and mātauranga Māori should be integrated into species recovery plans but this should be implicit in all aspects of conservation management and protection rather than a separate goal.

We are supportive of research to better understand data deficient species, but do not think that the National Science Challenges are necessarily the right mechanism for undertaking this. The appropriate researchers with the right skills and knowledge should be approached to undertake this. In addition, research should also be used to support threatened species that are not data deficient.

There is no provision for the assessment and reporting of goals set out under this strategy. Consideration should be given to how this will be achieved.

**7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

An additional goal needs to consider resourcing of such a strategy. DOC by its own admission, cannot do this work alone. There must therefore be consideration of how to resource NGOs and community groups to actively undertake this work.

To be truly Predator Free by 2050 requires that the suite of pest species be expanded to include feral cats, ferrets, pigs, hedgehogs, mice and several other land-based predators.

Also, the creation of marine protected areas is crucial to protect, particularly habitats used by threatened or endangered species such as the yellow-eyed penguin.

This Draft Threatened Species Strategy is led by DOC, however it requires input from other government departments including the Ministry for Primary Industries, Ministry for the Environment and Ministry for Business, Innovation and Employment. We believe a new goal requires a collaborative approach to protection of our threatened and endangered species.

Another goal is that the stakeholder-led Biodiversity Collaborative Group (which comprises industry, environmental NGOs and iwi, along with government agencies), and which is leading the development of a National Policy Statement on Indigenous Biodiversity should be integrated into the Strategy. Currently it is listed as a tool but we need to ensure strategic alignment.

Implementing the Strategy requires a goal for ongoing monitoring of a wide range of species to ensure that any changes in threat status are identified early enough to receive the required conservation effort. Specifically there should be a trigger for intervention to avoid extinction or an increase in the threat status of a species.

**8. Have we identified the right strategic themes?**

We agree with the strategic themes that have been identified but acknowledge that we need to move beyond just predator control for managing our ecosystems and protecting our wildlife. Whilst predator control will have benefits for many species – it should not be the sole focus of this strategy.

We particularly support the theme “managing ecosystems at scale to protect species”. Protecting whole ecosystems using landscape-scale management on land, in freshwater and at sea is ideal. We now need the right actions, goals and tools in place to support this theme.

We agree that we should be working together in partnerships to protect and enhance the natural environment. There needs to be more emphasis on government agencies working together for the benefit of our threatened species. For example, we need to work with the Ministry for Primary Industries to protect yellow-eyed penguins, other seabirds and other marine creatures from the impacts of fisheries and other oil, gas and extractive industries. Without this we cannot safeguard our vulnerable species.

In addition, maintaining genetic diversity and thus creating resilience for our threatened species should be considered as a theme.

### **9. Do you agree with our top 10 actions?**

We are not against any of the ten action per se, but if we take the example of yellow-eyed penguin, essentially we may not see any improvement or increase in the population under the actions in this strategy. Predator control already exists across much of the habitat (actions 1 & 2), the species is already identified as a priority (action 3), biosecurity and freshwater reforms are largely irrelevant (actions 4, 6 & 8), legislation already exists that would enable protection (action 5), threatened species hotspots have already been identified (action 7), a national recovery process integrating mātauranga Māori it currently under consideration (action 9) and a monitoring regime already exists (action 10).

### **10. Are there any other actions that should be included, and any actions that should be removed?**

Actions should also include implementation of terrestrial and marine protection for threatened species and habitats.

Actions are also needed to address and reduce anthropogenic impacts such as fisheries bycatch, destruction of habitat, pollution and climate change.

Expand action number 8 to focus researchers on further scientific work on specific gaps in knowledge of threatened species, as well as data deficient ones.

Actions should also include an increase in resourcing in order to have the capacity between DOC, other government departments, NGOs and community groups to deliver the strategy.

**11. Have we identified the right number of priority species?**

(Circle or highlight one) • Too many • About right • **Too few**

**Comments:**

All species that have been identified as threatened with risk of extinction should be prioritised. Prioritisation should start with species that have a higher classification status (i.e. nationally critically, nationally endangered and nationally vulnerable) and thus require immediate conservation action. Other shore-, land- and seabird species (e.g. Gibson's albatross, grey duck, white heron, Kermadec storm petrel, Salvin's mollymawk to name a few) that are classified as nationally critical have not been identified and included in the list of 150 priority species. Also excluded are other penguin species that have been categorised as nationally vulnerable (e.g. Eastern rockhopper penguin and Fiordland crested penguin).

Please note, since this report was published, the yellow-eyed penguin / hoiho has been reclassified to nationally threatened (Robertson et al. 2017; incorrectly listed here as nationally vulnerable).

**12. Have we identified the right priority species?**

No. Essentially, New Zealand's threat classification system already does the job of identifying priority species using the best available scientific information, i.e. those species that are at greater risk of extinction and decline.

**13. Do you think other species should be prioritised ahead of the ones listed?**

Yes

**And why?**

There are many species that are ranked higher on the national threat classification system which should be considered ahead of or as well as those currently listed. It appears that the list primarily contains the charismatic species, some of which already have an active conservation programme whether delivered by DOC or others.

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

Overall, we do **not** think that the Threatened Species Strategy is ambitious enough.

There are **not** enough species protected, managed and prioritised.

There is **no** evidence of any funding being made available to achieve goals and actions identified in this framework for safeguarding our vulnerable species.

There are **no** goals, actions and tools to support the theme of managing and protecting ecosystems.

There is **not** enough of a focus on the marine environment. The Strategy needs to consider the marine and terrestrial environment together to make any progress towards protection of certain species, particularly those like yellow-eyed penguins.



# New Zealand's Threatened Species Strategy: submissions for consultation

#110

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
(if on behalf of an organisation)

Email:

Signature:  
(we accept a typed signature if  
no electronic signature)



**Submission:**

**You can answer all or some of the questions.**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

This is an excellent vision. However it has the possibility of causing a gravy train for those involved unless resources to manage and maintain the activities are ensured.

2: Are there additional aspects that you think should be included in the vision?

The opening statement is fantastic

***If the land is well***

***And the sea is well***

***The people will thrive.***

However the lack of regeneration methods like tree planting to support the growing native bird population will cause this programme to stall. There needs to be long term 40 years dedication to people employed to carry out intensive trapping methods with regular follow up to ensure that pest species are eradicated.

History shows that the biggest loss of native species is the impact of humans on the growing agricultural and urban landscape. The massive decline in trees that support native birds caused the collapse of biodiversity of species.. The introduction of exotic mammals and birds insects has also threatened native birds.

For example – Agricultural practice of pesticides for knockdown methods and spraying of pesticides around land and waterways seriously affect native bees that are 89% responsible for native plant pollination. This is because native bees nest in the land.

1080 drops have caused the death of seven threatened kea in Franz Joseph.<sup>1</sup> Secondary poisoning from 1080 also is affecting the NZ falcon that are meat eaters.

The giant Powelliphanta land snails from the Stockton plateau were killed by chilling in the DOC fridges wiping out 800 of the endangered population<sup>2</sup>.

1

<http://karamacoff.co.nz/karamacoff/59476578/aurangilaction/news/kea-deaths> indicative\_of\_decimation\_of\_

3: Do you agree with the characterisation of the value and current state of our native species?

Yes

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

Poisons should be a last resort.

1080 and Brodificoum should never be aurally dropped. Should only be used in bait stations.

The aerial dropping of baits is indiscriminate and the collateral damage from secondary kills that are never picked up cause long lasting deaths of non-target species. Mainly ground carnivorous and bait eating birds.

Gene drive technology, CRISPA/Cas9 and genetic engineering should never be considered. The unknown dangers of genetic transfer, wild population immunity and non-target species effects make genetic technologies altering DNA of species extremely dangerous and should never be considered.

5: Are there other tools we could use to help us achieve the vision?

Dedicated pest inspection, border control, better funding of special positions in Biosecurity monitoring and control of disease outbreaks.

6: Will the proposed goals help us achieve the vision and assess our progress?

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

The new tools regarding self setting traps like Good Natures self setting traps<sup>3</sup> should be the first call with responsibly trained youth.

8: Have we identified the right strategic themes?

No, non-aerial methods should be used. Bait stations, self-setting traps and people to regularly monitor and clear the traps.

9: Do you agree with our top 10 actions?

See above

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • **About right** • Too few

**Comments:**

<sup>3</sup> <https://www.goodnature.co.nz/products/possum/>

13: Do you think other species should be prioritised ahead of the ones listed? And why?

Stoats and ferrets should be a priority.

14: Taken together, do you think the proposed vision; focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

Unless we have dedicated trapping rangers paid to work in the forests we will have a failure of pest control.

The 4 yearly 1080 aerial drops no collection of carcasses, leaving them as secondary sources shows that 1080 is a failure and as a possum control has actually led to our species decline. It must be stopped and

15: Do you have any further comments regarding the draft Strategy that is not covered above?

Put more money into a dedicated operation group to monitor and trap collect possums and stoats. Set up an industry around the fur and meat. Stop aerial drops of the toxin in our forests and

**DO NOT CONSIDER** genetic technologies (GM, CRISPA/Cas9 etc) for pest control.

I would like to be heard,



# New Zealand's Threatened Species Strategy: submissions for consultation

#111

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### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
(if on behalf of an organisation)

Email:

Signature:

*(we accept a typed signature if  
no electronic signature)*



**Submission:**

You can answer all or some of the questions.

**1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

No, the vision does not extend far enough when it comes to protecting and prioritising our threatened species and setting goals to ensure their recovery. Although I agree with the purpose of the strategy to “halt the decline in our threatened species and restore them to healthy populations”, I believe that all threatened and at risk species and their habitats should be included, not just 20% of them.

I agree that support and contributions from many other organisations and groups are required and have a role in protecting our species, however I also think that more emphasis needs to be placed on support and contributions from other government departments including the Ministry for Primary Industries, Ministry for the Environment and Ministry for Business, Innovation and Employment.

The national initiatives at the heart of achieving this vision including, Predator Free 2050, Battle for our Birds and the War on Weeds are supported; however, eliminating predators and weeds should not be the sole focus of the vision if we hope to halt the loss of our threatened species and their habitats.

**2. Are there additional aspects that you think should be included in the vision?**

Yes, additionally the vision should include all threatened and at risk species and their habitats. In particular species that are classified as nationally critical, nationally endangered and nationally vulnerable should be addressed, as well as a plan to halt fragmentation and loss of their habitats. Currently the strategy does not even extend to all of the critically endangered species. Actions should be included for marine species as well as terrestrial ones, traditionally such species have been placed in the “too hard basket”, but these need to be urgently addressed.

Feral cats, ferrets, weasels, pigs, hedgehogs, and several other land-based mammalian predators are currently omitted from the Predator Free 2050 initiative. I believe that all invasive predators should be included so that we can effectively reduce impacts and achieve protection of our threatened native wildlife.

The vision needs to address other impacts to native species and their habitats through fishing, mining and extractive industries, agriculture and urban development. As well there needs to be more of a consideration of the impacts

of climate change and how we can increase the resilience of ecosystems and populations to lessen the impacts.

**3. Do you agree with the characterisation of the value and current state of our native species?**

I agree with the characterisation of the value and state of our native species and their uniqueness.

Again, the “trouble in paradise” section focuses on introduced predators, herbivores and weeds as the major issue for our native species. Although this is an issue for much of our native wildlife, anthropogenic impacts including fishing (commercial and recreational), agriculture, water extraction, climate change and pollution also have substantial impacts on many of our species and need to be dealt with. Whilst many of these impacts are mentioned briefly it appears to be somewhat an afterthought. These impacts are significant and as such require effective strategies and actions to address them.

**4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

There is much of a focus on the planning of, rather than actually undertaking the work to achieve the vision. Whilst I understand the need for prioritising effort at sites with many species to maximise effectiveness and ensure efficient use of resources, this is not really a tool for achieving the vision as such. Prioritisation should be based on conservation needs rather than a lack of resources.

Translocations and captive management should be a last resort for safeguarding our vulnerable species, rather than a tool to achieve the vision. Although some species are suitable for translocation and captive management, this does not apply to all species, particularly those in the marine environment. In-situ management of species instead of captive management and translocations are much preferred for all of our species.

Fenced sanctuaries can offer protection to local populations of native species, but they are expensive and require continuous maintenance. Additionally, many species are entirely unsuitable for protection within fenced sanctuaries, including marine species or those with large home-ranges. There is existing research showing that land-based threatened species can be effectively managed by trapping, rather than within fenced areas and at a lower cost (Reardon et al. 2012).

Recovery groups and associated recovery plans are necessary to support conservation work and achieve positive outcomes for New Zealand’s endangered species. Recovery groups and plans should provide effective

guidelines and recommendations for conservation groups, landowners, researchers, communities and managers to follow.

Whilst I agree with improving legislation and regulations to support and protect our native species, largely these mechanisms already exist. We now need to implement effective protected areas (e.g. marine reserves and nature reserves) at a suitable scale and in appropriate locations. This could easily be established under the current legislative system given the appropriate political will.

## **5. Are there other tools we could use to help us achieve the vision?**

Provision of a budget to achieve this vision should be included as a tool and integrated into the overall strategy, as there is currently no provision for funding under the current strategy. Prioritisation and commitment of funding and resources for the protection of our species is an essential part of achieving this vision. As a significant drawcard for tourism in this country, as well as significance for conservation and biodiversity, our wildlife requires substantial investment so that it can be effectively protected into the future.

Research and science should be added as a tool to identify the threats and impacts to our native species, identify gaps in our knowledge and design effective conservation management strategies to protect them. Science and research should also be resourced to enable this to happen.

Protected areas in both the terrestrial and marine environments can be used as an effective tool for protecting our threatened species and their habitats. Such areas would need to be effectively designed so that the scale and location are appropriate for the species and habitat that they are protecting, and could be established under the existing legislation (e.g. marine reserves, sanctuaries or nature reserves).

Marine and terrestrial extractive industries including fisheries, mining and farming should be regulated effectively to reduce the impacts on our native species. Monitoring and enforcement of the regulations should also be part of this tool to ensure effectiveness. Industries should be assisted with transition to other methods which have a reduced impact of New Zealand's wildlife.

## **6. Will the proposed goals help us achieve the vision and assess our progress?**

The proposed goals will go some way to achieving the vision of safeguarding our vulnerable species. Unfortunately, only the minority of our species have been highlighted for protection from and management of predators and an even smaller percentage have been prioritised for population enhancement. We cannot achieve a goal of safeguarding our vulnerable species without including



all of our most vulnerable species (i.e. in the first instance, those species classified as nationally critical, endangered and vulnerable).

I agree that Te Ao Māori and mātauranga Māori should be integrated into species recovery plans, but this should be implicit in all aspects of conservation management and protection rather than a separate goal.

I am supportive of research to better understand data deficient species, but the National Science Challenges are not necessarily the right mechanism for undertaking this. The appropriate researchers with the right skills and knowledge should be approached to undertake this work. In addition, research should also be used to support and investigate threatened species that are not data deficient.

There is no provision for the assessment and reporting of goals set out under this strategy. Consideration should be given to how this will be achieved.

**7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

In addition, a goal needs to be included which considers the funding and resourcing of the strategy. DOC by its own admission, cannot do this work alone. There must therefore be consideration of how to resource NGOs and other community groups to actively undertake this and future work.

To be truly Predator Free by 2050 requires that the suite of pest species be expanded to include feral cats, ferrets, pigs, hedgehogs, mice as well as several other land-based mammalian predators.

The creation of marine and terrestrial protected areas is crucial to protect, our threatened and endangered species and their habitats.

I believe that a new goal requires a collaborative approach to the protection of our threatened and endangered species. This strategy is led by DOC, however importantly it requires input from other government departments including the Ministry for Primary Industries, Ministry for the Environment and Ministry for Business, Innovation and Employment.

Implementing the strategy requires ongoing monitoring of a wide range of species to ensure that any changes in threat status are identified early enough to receive the required conservation effort. More specifically, there should be a trigger for intervention to avoid the increase in the threat status of a species or its extinction.

**8. Have we identified the right strategic themes?**

I agree with the strategic themes that have been identified but acknowledge that we need to move beyond just predator control for managing our ecosystems and protecting our wildlife. Whilst predator control has benefits for many species – it should not be the sole focus of the strategy.

I particularly support the theme “managing ecosystems at scale to protect species”. Protecting whole ecosystems using landscape-scale management on land, in freshwater and at sea is ideal. We now need the right actions, goals and tools in place to support this theme.

I agree that we should be working together in partnerships to protect and enhance the natural environment. There needs to be more emphasis on government agencies working together for the benefit of our threatened species. For example, working with the Ministry for Primary Industries to protect marine species from the impacts of fisheries and other oil, gas and extractive industries. Without this we cannot safeguard our vulnerable species.

**9. Do you agree with our top 10 actions?**

I am not against any of the ten actions, but essentially we may not see any improvement or increase in threatened species populations under the current actions in this strategy.

**10. Are there any other actions that should be included, and any actions that should be removed?**

Actions should also include implementation of terrestrial and marine protection for threatened species and habitats.

Actions are also needed to address and reduce anthropogenic impacts such as fisheries bycatch, destruction of habitat, pollution and climate change.

Expand action number 8 to focus researchers on further scientific work on specific gaps in knowledge of threatened species, as well as data deficient ones.

Actions should also include an increase in resourcing in order to have the capacity between DOC, other government departments, NGOs and community groups to deliver the strategy.

Additionally an action which maintains genetic diversity and thus creating resilience for our threatened species should be considered.

**11. Have we identified the right number of priority species?**

(Circle or highlight one) • Too many • About right • **Too few**

Comments:

All species that have been identified as threatened with risk of extinction should be prioritised using the existing national threat classification process. Prioritisation should start with species that have a higher classification status (i.e. nationally critically, nationally endangered and nationally vulnerable) and thus require immediate conservation action. Other land-, shore- and seabird species (e.g. Gibson's albatross, Kermadec storm petrel, Salvin's mollymawk, grey duck, white heron, to name a few) that are classified as nationally critical have been excluded from the list of 150 priority species.

## **12. Have we identified the right priority species?**

No. Essentially, New Zealand's threat classification system already does the job of identifying priority species using the best available scientific information, i.e. those species that are at greater risk of extinction and decline.

## **13. Do you think other species should be prioritised ahead of the ones listed?**

Yes

### **And why?**

There are many species that are ranked higher on the national threat classification system which should be considered ahead of or as well as those currently listed. It appears that the list primarily contains charismatic species, some of which already have active conservation programmes whether delivered by DOC or others.

## **14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

Overall, I do not think that the Threatened Species Strategy is ambitious enough.

There is no provision for any funding to achieve goals and actions identified in this framework for safeguarding our vulnerable species.

There are not enough species protected, managed and prioritised as part of the strategy.

There are no goals, actions and tools to support the theme of managing and protecting ecosystems.

There is not enough of a focus on the marine environment. The strategy needs to consider the marine and terrestrial environment together to make any progress towards protection of our threatened species.

# New Zealand's Threatened Species Strategy: submissions for consultation

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### Submitter details:

Name of submitter  
or contact person:

[Redacted]

Organisation name:  
*(if on behalf of an organisation)*

Auckland Council

Email:

[Redacted]

[Redacted]





Submission from Auckland Council

To

Department of Conservation

DRAFT THREATENED SPECIES STRATEGY 2017

31<sup>st</sup> July 2017

# Mihi

*He tika ki te mihi ki te tīpuna matua o te Waonui a Tāne, ara kō Tānemahuta  
Nana nei ngā tamariki maha o te Waonui,  
Whakarongo ki te reo tīriori o te manu me te aitanga-pepeke  
Ko rātou mā ngā tīpuna hei arahi mō te hunga tangata me pēhea te huarahi kia maia ki te  
noho tahi me te taiao,  
Kia tu kaha ki te tiaki i ēnei tīpuna, i ēnei taonga tuku iho, kia kore ai i ngaro*

*I greet the eponymous ancestor and protector of our forests  
The one who gave life to all children in his domain  
Listen to their voices, the birds and insects of the forest who sing sweet melodies  
Let us learn from these ancestors and how they live in peace and reciprocity with nature  
The responsibility rests on our shoulders to protect these treasured species so they are not  
lost for future generations*

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## Introduction

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, and by the Biosecurity Act to deliver regional leadership in biosecurity and pest management. 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 there is disproportionate investment by DOC in species management in some regions, and that without council and

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

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 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, a broader range of management responses and wider range of pests beyond those targeted through Predator 2050 are also important and 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 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 (BGANZ):** The Auckland Botanic Gardens (a member of BGANZ) are an Auckland Council facility, and the council is very supportive of this initiative. We note that the Botanic Gardens are contributing to BGANZ's submission to the draft strategy.

**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 managed 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.

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

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<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.

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.



## Submission on the Threatened Species Strategy

July 2017

Working Waters Trust

1. Working Waters Trust is a charitable trust dedicated to celebrating the wonders of New Zealand's native freshwater fish and restoring and protecting their habitats. Our projects are spread across numerous catchments in Canterbury, Otago and Southland. We work alongside rūnanga, private landowners, councils, government departments and school and community groups on various freshwater restoration/rehabilitation projects which benefit endangered native freshwater fish and improve water quality.
2. We are concerned about the widespread decline in aquatic biodiversity and water quality in New Zealand's freshwaters.

### General comments:

3. Working Waters Trust wishes to commend the Department of Conservation for deciding to draft this Strategy. We believe it is necessary to provide an important overview of all threatened species in Aotearoa New Zealand. We think the Strategy could be improved by removing excessive narratives and 'spotlights' that draw the focus away from the overarching goals of the Strategy. We **recommend** that the Strategy should be concise and to-the-point to ensure focus is on urgent need for action and threatened species.
4. Working Waters Trust **recommends** inclusion of metrics of feasibility and cost effectiveness in the algorithm / species selection process. We acknowledge that inclusion of these metrics is not practicable in time for the intended September launch of the strategy. We therefore call for transparency in the meantime, and for a review of the algorithm to add in these metrics at a later date. Working Waters Trust **recommends** for the Department to specify how it intends to address the feasibility of species management in the Strategy. Working Waters Trust **is concerned** that species selected may change without public consultation once an economic lens has been cast over them. Or alternatively, that some of the chosen species are not cost effective to manage, and that this will come at the expense of other lower ranking species in which gains could be made cost-effectively.

5. Working Waters Trust **recommends** the addition of a specific review period for the Strategy, perhaps every 5-10 years. The species selection algorithm should also be reviewed.
6. Working Waters Trust **is concerned** that the Strategy is bird-centric for both its actions and main associated initiatives listed i.e. 'Predator Free 2050' and 'Battle for the Birds'. Threatened plants, invertebrates, freshwater and marine species are not as well covered by the Actions or the specified funded initiatives. The funded freshwater initiatives specified as supporting the Strategy (e.g. National Policy Statement for Freshwater Management) do not address major issues such as habitat quality degradation, fish passage, or trout predation. Although given, one of the objectives of the NPS-FM is to 'safeguard the life-supporting capacity' of waterways, its emphasis is to provide this through the management of water quality and quantity. In addition, in the opinion of Working Waters Trust, it is the Department's responsibility to lead the conservation of our freshwater species with support from Regional Councils. Therefore, Working Waters Trust **recommends** a new department-led freshwater initiative 'Fight for our Fish' to address habitat quality degradation, fish passage, and trout predation.
7. Working Waters Trust is **concerned** that no new targeted funding has been allocated to support the implementation of this Strategy. Nor is there any proposed statutory backing, which we believe has led to a lack of success with Department strategies in the past. The Strategy proposes to increase the numbers of threatened species managed, (i.e. '500 species for protection by 2025 – a 40% increase on today – and 600 species for protection by 2030') and increase monitoring of species (i.e. Action 10) with no announcement of increased funding above the current funding baseline. Working Waters Trust **strongly recommends** that species numbers managed under the Strategy should reflect funding levels, and not to be overly ambitious, resulting in a spread too thin for effective management.

**Notable species:**

8. Working Waters Trust **supports** the inclusion of the longfin eel (*Anguilla dieffenbachii*) and giant kokopu (*Galaxias argenteus*) as notable species. However, we **recommend** that inanga (*Galaxias maculatus*, At Risk-Declining) should also be included as a notable species due to its predominance in the whitebait fishery and importance as a mahinga kai species. Working Waters Trust notes that in the Strategy 'threatened taxa such as kākāpō, which are considered socially important (or 'notable') are, by virtue of their weighting,

automatically included in the selection.’ Working Waters Trust **requests** more transparency around how socially important species have been selected.

**Strategy actions:**

9. Working Waters Trust **recommends** an addition to Action 5, to progress key regulatory reforms for native freshwater fish protection i.e. legislation to improve tools which protect threatened freshwater fish and freshwater fish habitats. The continued development of a National Policy Statement for Indigenous Biodiversity may provide adequate protection, however the development of this NPS has been unacceptably long, and in our view is risking species extinctions as a result of the delay.
10. Working Waters Trust **recommends** that the Strategy should extend Action 7. In addition to publishing biodiversity ‘hot spots’ on private land, there should be a push to afford greater protection to the species, for example by championing changes to current legislation such as the Wildlife Act 1953 (as per point 9 above). As written, it needs to be clarified what benefit the sole action to identify and *publish* threatened species ‘hotspots’ will result in.
11. Additional funding should be allocated for routine monitoring (Action 10) and tagged funds set aside in preparation for a response when species triggerpoints are reached.
12. In ‘Regulation’ on page 25 it states that ‘Marine and aquatic life and all invertebrates *can be* protected through the Wildlife Act 1953, and freshwater fish through the Freshwater Fisheries Regulations 1983.’ Working Waters Trust believes this statement fails to recognise that our most threatened native freshwater fish have no legal protection under either this Act or the Regulations. The only freshwater fish explicitly protected under the Wildlife Act 1953 is the New Zealand grayling, which is extinct. The Freshwater Fisheries Regulations 1983 prohibit the intentional kill or destruction of indigenous fish, but has many exemptions (i.e. insofar as not causing ‘restriction on the taking of whitebait, or eels, or other indigenous fish for the purposes of scientific research or for purposes of human consumption, or as affecting the operation of any other regulations which restrict the taking of any indigenous fish). Therefore, we find this statement in the Strategy misleading. We **recommend** it should be amended to clarify that there is a lack of protection for freshwater fish, and to recommend progressing regulatory reform.

**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 12:48 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Name:** [REDACTED]  
**Organisation:**

**Email:** [REDACTED]

q1: I applaud the direction of the vision but not the scope. It does not go far enough especially in the number of threatened species it aims to cover. It also talks about guiding the decisions of DoC but not other government departments such as MPI

q2:

q3: Yes

q4: Mostly yes

q5: I believe there should be a species management plan for every threatened species which would mean that DoC would be in charge of conservation management of the species rather than other government departments, like MPI, who have priorities other than conservation. I think better partnerships can be forged with Universities to help assess species where there is insufficient knowledge.

q6: I don't believe enough species are covered in the proposed goals. As the number of threatened species increases due to increased knowledge for some and further decline for others I think the current goals will see us going backwards.

q7:

q8:

q9:

q10: Within the increase in knowledge I think there also needs to be an assessment of areas of public conservation land. Some of the public conservation estate has been assigned a low level of protection simply because it's values have not yet been adequately assessed (this was always intended in the future). This needs to be done so that high value conservation land cannot be developed or sold before it is assessed.

q11: toofew

q11comments: I understand this is largely an issue of funding. However, you stated the number of threatened species is likely to increase due to increased knowledge for some and further decline for others. I think the 40% increase of will see us going backwards as a proportion of overall endangered species.

q12: I don't think Stewart Island kiwi should be such a high priority due to reasonable numbers and fewer threats than on the mainland

q13:

q14: Mostly yes. However I think it doesn't go far enough (I understand funding is a huge factor here). I am also concerned about other government departments with different priorities having a greater influence than DoC and not being guided by this strategy. I use sea lions as an example here where their conservation is managed by MPI and they have clearly shown preference for the fishing industry with MOUs and independent meetings. They have deliberately withheld information and excluded certain parties. They have delayed making or ignored changes recommended by independent experts and regularly blocked efforts to fill knowledge gaps.

q15: I think there should be a moratorium on development or selling or swapping of all conservation land that has not been assessed and assigned a specific status until that assessment has taken place. I use recent attempts by DoC to swap conservation land for the Ruitaniwha Dam project as an example. It was described as low value conservation land simply because it hasn't been properly assessed. The same was true of the Denniston Plateau.

# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
(if on behalf of an organisation)

Email:

Signature:  
(we accept a typed signature if  
no electronic signature)

██████████  
Shark Dive NZ Ltd.

████████████████████

██████████

**Submission:**

**You can answer all or some of the questions.**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

Yes, although instead of increasing the list how about get the existing listed species' in better shape.

2: Are there additional aspects that you think should be included in the vision?

3: Do you agree with the characterisation of the value and current state of our native species?

Yes

4: Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?

Coupled with those tools should be enforcement of the regulations, which is sadly lacking now.

5: Are there other tools we could use to help us achieve the vision?

Yes, enforce the regulations that are already in place for the protection of the threatened species.

6: Will the proposed goals help us achieve the vision and assess our progress?

The goals don't quantify how the vision will be achieved. How will you enhance the population of Great White sharks when you don't enforce the regulations that are there to protect them? Focus your attention on the actual people who are harming these fish and not the shark cage divers who are actually out there educating the public on sharks.

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

8: Have we identified the right strategic themes?

Yes

9: Do you agree with our top 10 actions?

Yes

10: Are there any other actions that should be included, and any actions that should be removed?

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • **About right** • Too few

## Comments:

12: Have we identified the right priority species?

13: Do you think other species should be prioritised ahead of the ones listed? And why?

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

15: Do you have any further comments regarding the draft Strategy that is not covered above?

As passionate Great White shark lovers, our role is to educate people on the Great Whites' natures and to give visitors the unique experience of seeing GWS in their natural environment and where fears and myths are quickly dispelled. The Great White shark is not a ruthless killing machine as is made out in popular culture. Instead people are pleasantly surprised to see how graceful, elegant and curious these fish actually are. Stewart Island is one of only five places in the world where Great White sharks aggregate so their protection in this location is paramount.

Shark Dive NZ has seen first hand the brutal way in which Great White sharks are treated by those who are fearful of them. Great White sharks' survival is threatened daily by fishers who set their nets at known GWS aggregation areas around Stewart Island. Not only are the unfortunate sharks caught up in these, so are other protected species, such as Yellow-Eyed penguins, blue penguins, NZ Fur seals, Sootys Shearwater birds and Stewart Island shags. This is unacceptable especially when there is an easy fix.

We propose the introduction of a shark sanctuary around Stewart Island. This would mainly include the known aggregation zones for the GWS around the Northern TiTi Islands, north of Half Moon Bay. This sanctuary area would include a ban on all commercial fishing to keep the GWS and other protected species' safe.

A shark sanctuary has already been successfully implemented at the Neptune Islands (Ron and Valerie Taylor) Marine Park and is an excellent example of marine conservation in action.

We have raised over 1200 signatures of support for the shark sanctuary at Stewart Island from like-minded people who wish for the sharks and other threatened species to have full protection. These have been included with this submission.

The creation of a shark sanctuary would fulfil the goals that the Department of Conservation has set itself for the protection of threatened species, in particular the Great White shark.

# New Zealand's Threatened Species Strategy: submissions for consultation

#116

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

[REDACTED]

Organisation name:  
(if on behalf of an organisation)

Save The Otago Peninsula

Email:

[REDACTED]

Signature:

[REDACTED]

*(we accept a typed signature if  
no electronic signature)*





**Submission:**

**You can answer all or some of the questions.**

**1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

In part, yes, but there are

- a) concerns about the exclusion of some endemic species which are important in a local context – eg Otago shag, limestone plants
- b) essentially the reliance on a restricted set of methods to achieve these goals (Predator Free NZ, War on Weeds and Battle for the Birds.)
- c) research restrictions

**2: Are there additional aspects that you think should be included in the vision?**

All tools available, as identified by scientific investigation, including tools to fight pathogens should be included and not just the three projects above.

Local areas should be able to add (and remove) species that are important within their area.

**3: Do you agree with the characterisation of the value and current state of our native species?**

Yes

**4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

Yes, in general.

**5: Are there other tools we could use to help us achieve the vision?**

Gene typing will help us understand when mere population increase is not the best method to measure success and will guide translocations.

Not just fenced sanctuaries but also mainland islands as are currently being created particularly on peninsulas, will, in our view, become increasingly important.

More emphasis on whole of habitat rather than single species protection will assist with the protection and enhancement of insect species in particular. While this is addressed late in the document it does not seem to have permeated the whole document.

## **6: Will the proposed goals help us achieve the vision and assess our progress?**

While one can understand that Goals 1 and 2 aim to make DOC's role more manageable by restricting the number of species, STOP would like to see more species added for inclusion, especially at a local level. This is partly to do with advocacy. If a species is not on the DOC **List**, that may exclude DOC from undertaking appropriate action when a species is threatened by development in particular.

Goal 1 is going to be achieved by the "Predator Free 2050 Campaign" and the War on Weeds", plus the "Battle for our Birds" (increased predator control in most years), so essentially we may not see any improvement in increase in numbers of already extensively trapped species such as yellow-eyed penguins, to which the other two projects do not apply, under these strategies.

For species such as kauri, or the plants in the Myrtaceae family that are at risk from pathogens this goal is not going to have an effective strategy in place.

The research goal (4) is limited to research on data deficient species. Species such as the yellow-eyed penguin, or the Jewelled gecko do not really fit into that. In our opinion, research needs to be added to the aims of Goal 1 and 2 of "enhancing the populations" and applied across the board.

## **7: Are there alternative goals that you think will better achieve the vision and assess our progress?**

Add: Monitor the progress towards achieving the goals. Although this appears in Actions, we consider it should also appear in Goals as part of the public information on whether or not the strategy is being successful.

## **8: Have we identified the right strategic themes?**

Landscape scale efforts against invaders is probably less efficient in the first instance than building up mainland islands in which predators are reduced significantly, from which further efforts to extend control can be based is probably a more effective method.

This is the section that STOP would most like to endorse – managing ecosystems at scale to protect species - will have the effect of also protecting other less obvious species such as those from the insect world on which the higher order species such as fish rely on, and on which this policy largely sidelines/ignores.

Sequencing genomes is likely to become more and more cost effective and simpler to achieve and is absolutely necessary if we are to avoid genetic bottlenecks and a high level of mutation due to genetic inbreeding.

## 9: Do you agree with our top 10 actions?

YES

Note that we Endorse 5

- *Progress key regulatory reforms: New marine protection legislation to provide more flexible tools for protecting marine ecosystems.*
- *The continued development of a National Policy Statement for Indigenous Biodiversity by the stakeholder-led Biodiversity Collaborative Group. Not sure who they are? Have never heard of them before.*

Endorse 10

*10. Develop and implement a comprehensive monitoring regime that can be used by all those involved in species management that:*

- *Provides timely useful information on threatened species*
- *Specifies a trigger for intervention to avoid extinction or increase the threat status of a species.* This may be too late for many species such as yellow-eyed penguins where the initial trigger for intervention (trapping) was recognised and begun 30 years ago and has undoubtedly allowed these penguins to survive longer than predicted in 1987. Also the Jewelled gecko where increased penalties appear to have slowed the rate of decline due to poaching, and vegetation management has reduced rodent predation. However monitoring is ultra important so that such triggers are recognised early and can be counterbalanced.

However, the society endorses all 10 actions

## 10: Are there any other actions that should be included, and any actions that should be removed?

## 11: Have we identified the right number of priority species? (Circle or highlight one) • Too few

### Comments:

We are concerned with the exclusion of some local endemic species – see below, although this list is not exhaustive.

## 12: Have we identified the right priority species?

Our interests naturally concern all the species within our area with threatened status and we consider that within the country there should be allowance for replacement of

some species not found in the region, with others that are of particular importance, and especially those with high threat levels.

**13: Do you think other species should be prioritised ahead of the ones listed? And why?**

The newly recognised Otago Shag is low in numbers and is threatened by development oriented local bodies. The local DOC office needs to have the power (ie it needs to be on the list of their priority species) to appeal at resource consent hearings and to encourage research and take actions that will assist this species to flourish.

We would also like to see the list of reptiles increased to cover more species. The power to discourage and prevent poaching needs to cover all species, not just those, like the Jewelled Gecko, currently being assisted by Community Groups such as ours. By leaving others off the list it will become difficult for DOC to foster research and protection when new populations are identified.

**14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

While it is a start, our concern is that some species will be ignored, leading to their extinction.

It is one approach but has the danger of excluding some species from action by DOC, and risking these therefore from becoming extinct. For instance *Lepidium crassum* (Cook's Scurvy Grass), so important for local birds, if excluded could prevent DOC from putting up signage and protective fencing to discourage vehicles and walkers from trampling it, because it was **not in the list**.

**15: Do you have any further comments regarding the draft Strategy that is not covered above?**

It seems glaringly obvious that there is no new money associated with this prioritisation and apart from existing campaigns (Predator Free, War on Weeds and Battle for our Birds), it is not clear how this will be funded. If we are cynical, it may be that all it does is lessen the load on DOC because they can wipe out any actions that protect and enhance the survival of other species, including those not currently making the threatened list but still reducing in numbers due largely to reduction in habitat.

# New Zealand's Threatened Species Strategy: submissions for consultation

#117

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

[REDACTED]

Organisation name:  
(if on behalf of an organisation)

Predator Free New Zealand

Email:

[REDACTED]

Signature:

*(we accept a typed signature if  
no electronic signature)*



## Submission:

You can answer all or some of the questions.

### **1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

Would be good for the vision to be tighter and more succinct. The first paragraph is probably sufficient as a vision.

### **2: Are there additional aspects that you think should be included in the vision?**

Would be good to highlight the role that public education has to play in protection of threatened species. Highlighting various species and raising awareness of our unique species is vital to public engagement.

### **3: Do you agree with the characterisation of the value and current state of our native species?**

The current definitions on species status are confusing for many — we've had this feedback often. We would recommend using more clearly understandable risk categories as per the recent PCE report.

### **4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

There is little reference in the draft to the massive role played by volunteers and community conservation groups who often work on non DOC owned land. Without them New Zealand's biodiversity would be in far more parlous state. More strategic encouragement and support for them is critical to the Threatened Species Strategy.

Fenced sanctuaries are mentioned but unfenced sanctuaries should also be included as a useful tool too. Places where predators are continually suppressed to a low level will provide useful breeding areas for threatened species.

Translocation is an important tool in the management of threatened species but needs careful consideration on the benefits and negative effects. As part of the threatened species strategy it would be useful to create a clear national policy on translocation. The PCE report recommends this too.

Regulation is an important element in protecting species. Specifically the Predator Free New Zealand Trust would like to see better regulation around the management of cats so that unowned cats in ecologically sensitive sites can be controlled. Wandering cats decimate our native species so limiting their impact seems essential. Cat colonies should be prohibited. LGNZ is in support of better cat management and it would be good to see this as part of the Threatened Species Strategy.

### **5: Are there other tools we could use to help us achieve the vision?**

There is no mention of technologies needed to control predators and provide safe habitats for threatened species. There is a need for better predator control tools especially at low densities of predators, for unowned cats, and for non-expert users. There is also no mention of the role of community conservation efforts in providing safe habitat for species. It is important that these groups are supported to continue the vital work they do. A more strategic approach to funding is necessary, prioritising secure funding for groups with proven success that are protecting key ecosystems for threatened species.

A strategic approach for connected corridors of habitat is important for species migration and genetic diversity.

### **6: Will the proposed goals help us achieve the vision and assess our progress?**

### **7: Are there alternative goals that you think will better achieve the vision and assess our progress?**

Better suite of predator tools for expert and non-expert users across a range of landscapes/settings and for a range of predators.

The draft does not mention the need to raise public awareness on the range of native species that we have in NZ and the trouble that they are in. Public support is essential to attract commercial partners, to encourage volunteering in community conservation. Having spokespeople such as the Threatened Species Ambassador is essential to get public support – however to be effective it is essential that the TSA has a well thought out strategy and a coherent script.

### **8: Have we identified the right strategic themes?**

Uniting against invaders on a landscape scale – Landscape scale predator control is essential. Maximising the use of our current tool kit as well as development of new tools is essential for control of predators, especially at low densities. Easy to use tools for non-expert or backyard trappers is also vital. It is important that the impacts of unowned cats are highlighted and development of tools for cat control is supported.

Building our science knowledge base – there is currently no mention of genetics and managing the genetics of a species, this is very integral to long term survival of species. Genetic management needs to be integrated into species management plans. Lack of genetic diversity puts species at risk.

Focussing beyond public conservation land – We need all New Zealanders to feel like they can make a difference to the survival of threatened species. Enabling

everyday New Zealanders to be able to do something is important for social engagement.

There are many QEII covenants where no predator control or restoration takes place. Encouraging and providing support for covenant holders to maximise the ecological value of their covenants is important.

Partnerships – DOC needs to support and empower those wanting to participate in protecting our natural environment. Community groups need to be empowered and supported and DOC should play a supporting role and ensure true partnerships.

**9: Do you agree with our top 10 actions?**

The strategy should acknowledge the massive role played by volunteers and community conservation groups who often work on non DOC owned land. More technical and financial support for them is critical to the Threatened Species Strategy – see PCE Report.

Tools should include investing in research into feral cat control and managing cat populations.

User friendly tools for non-expert users are also important – as much for public engagement as they are for ecological impacts.

Use of riparian planting to maximise ecosystems for native species.

**10: Are there any other actions that should be included, and any actions that should be removed?**

The key action missing from the current list is “Supporting and funding community conservation groups”. Conservation groups play a vital role in providing safe habitats for threatened species and need good support to be effective. Long term secure funding for groups with proven success is essential, especially those in areas that fit the strategic plan to protect species

**11: Have we identified the right number of priority species?**

(Circle or highlight one) • Too many • About right • Too few

**Comments:**

**12: Have we identified the right priority species?**

**13: Do you think other species should be prioritised ahead of the ones listed? And why?**

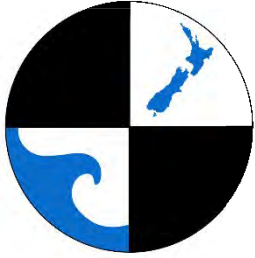


**14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

**15: Do you have any further comments regarding the draft Strategy that is not covered above?**

You mention partnerships with others – these need to be true collaborative partnerships, often partners are left feeling disenfranchised. Care is needed to ensure that partners are well managed and looked after and not over burdened by bureaucratic requirements. Particularly with community groups with the majority of the work is voluntary. If you make it too hard and too much paperwork you will put people off and kill the energy and inspiration.





Established 1968  
**New Zealand Freshwater Sciences Society**

31 July 2017

Department of Conservation  
Whare Kaupapa Atawhai / Conservation House  
PO Box 10420  
Wellington 6143  
[threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

**Submission on the Department of Conservation's New Zealand's Threatened Species Management Strategy**

Dear Minister Barry, Associate Ministers Dunn and Wagner

**Introduction**

1. The New Zealand Freshwater Sciences Society (NZFSS) was established in 1968 as the New Zealand Limnological Society. It is a constituent body of the Royal Society of New Zealand and has some 430 members. The Society's membership spans the breadth of academics and researchers to resource managers in the field of freshwater. NZFSS is the key professional society for practitioners in freshwater science and management in New Zealand. The Society aims to "establish effective liaison between all persons interested in any aspect of fresh or brackish water research in New Zealand, and to encourage and promote these interests.
2. The NZFSS welcomes the opportunity to comment on the draft New Zealand's Threatened Species Strategy produced by the Department of Conservation.
3. The NZFSS is concerned about the widespread decline in aquatic biodiversity in New Zealand. A large proportion of the Society's membership is directly involved in resource management as experts at the local government, Environment Court and central government levels and a number of members are accredited as independent hearings commissioners through the "Making Good Decisions" programme. These members have a wealth of science and resource management expertise that includes the management of threatened aquatic species, both flora and fauna.

4. The Society understands the Threatened Species Strategy has been developed to lead the Department of Conservation's and partner organisations' management of threatened species in New Zealand. Within the strategy are broad level management actions and goals for terrestrial, marine and freshwater flora and fauna.

5. The NZFSS have included in our submission:

- a) General Comments
- b) Freshwater Species included in the Threatened Species Strategy;
- c) Predator free New Zealand; and
- d) The Top 10 Actions for threatened species.

### **General Comments**

6. The Society supports the development of a national Threatened Species Strategy and believes the guidance offer to all parties working on the conservation of native species will benefit from a well-developed strategy to manage threatened flora and fauna.

7. The Society does note that this strategy does not appear to have any statutory standing and as such can be considered a "work plan" for the Department and its partners. It is our submission that the Threatened Species Strategy be given a statutory position so that other parties have to at least give regard to this Strategy. It has been the experience of Society members the previous Threatened Species Recovery Plans have had little value outside the Department of Conservation as they had no statutory status.

8. We also note that Threatened Species Strategy document provides many examples of on-going conservation work and discusses conservation management techniques and options (e.g., right tools for the job). However, the strategy provides very little in the way of good news stories for freshwater species or habitats nor are the methods for conservation action freshwater-orientated. The Society has significant concerns that this demonstrates limited conservation action in freshwater and the difficulty the Department has in achieving conservation gains in freshwater. It also demonstrates the limited array of management actions available to the Department and its partners to achieve freshwater conservations.

9. The Society is also concerned that the Department's ability to manage freshwater ecosystems is limited as demonstrated by the focus of its large conservation programmes – Predator free New Zealand, The Battle for our Birds, War on Weeds that are all focused on terrestrial conservation issues. We submit there is a need for a strong, well-funded flagship freshwater programme – Fight for our Fish has been suggested – and that a strong workstream is developed for this programme. Given this Threatened Species Strategy has focused on freshwater fish this would be appropriate.

### **Freshwater Species in the Threat Strategy**

10. The Threatened Species Strategy includes 14 freshwater fish but no freshwater invertebrates and macrophytes in the 150 priority species. The State of our Species section (page 12) shows there are 73 threatened freshwater invertebrates and another 172 that are data deficient. The Society submits that the state of our freshwater invertebrates is such that at least some should be included in the Threatened Species Strategy to begin to understand the conservation threats and manage these. At present, the Strategy appears to ignore freshwater invertebrates.

11. The 14 freshwater fish in the strategy include five migratory species that distributed around New Zealand. However, this includes torrentfish and shortjaw kokopu that are absent from large areas of New Zealand (e.g., no shortjaw kokopu in the Southern South Island and most of Canterbury, and the east coast of the North Island). The other nine fish have restricted distributions, seven of which are restricted to Otago, one to Canterbury and one to Canterbury and Otago. In fact, of 14 fish, only shortjaw kokopu and the Waitaki lowland longjaw do not occur in Otago. Therefore, the Strategy has the potential to concentrate freshwater threatened species actions on just fish and only in Otago with little done elsewhere. Given the state of decline of freshwater ecosystems nationally, and the growing number of fish listed as threatened in recent years, the Strategy may have little impact with respect to reversing the decline of freshwater species and ecosystem health in many parts of the country.

12. It is also notable that in Otago, water management, especially water abstraction is undergoing a substantial reallocation process as the Deemed Water Permits are being replaced with standard resource consents. Deemed permits are to be terminated in October 2021. All seven of the fish restricted to Otago occur in at least some streams that are subject to Deemed Permit water abstractions. Any changes to the flow and water abstraction regimes in these streams could have significant negative or positive effects on the state of these threatened species. Therefore, the Society submits that, given this focus on freshwater fish in Otago and the urgency associated with the deemed permit closure, the Department ensures it provides sufficient resources to Otago to achieve the Threatened Species Strategy goals. If development of work programmes under the Threatened Species Strategy is slow the opportunity for this strategy to contribute to the deemed permit closure process and the management of threatened fish in Otago will be lost.

13. The freshwater fish selected could include additional species that spread the geographic range of species being managed. The black mudfish and Northland mudfish are two threatened species that we would recommend the Department consider for inclusion in the Threatened Species Strategy. Both are restricted in range, threatened by habitat loss and habitat degradation. These species would increase the geographic range for freshwater actions to Waikato, Auckland and Northland allowing greater advocacy for freshwater ecosystem and wetland management and protection. It would also provide for avenues for North Island iwi, conservation groups and partner organisations over a much greater area of New Zealand to contribute to threatened species management in freshwater. If this requires that the Department drop other freshwater fish from the Strategy then the Nevis galaxiid could be removed. This fish is threatened by salmonid invasion of its habitat but the Nevis River is protected by the Kowhai Water Conservation Order and the adjacent terrestrial environments are either DOC estate or low intensity grazing land, with little impact on the majority of the Nevis galaxiid habitat and populations. Development of salmonid protection methods (see below) at other galaxiid areas could subsequently be used in the Nevis Valley if required for the protection of this fish.

14. Inanga is a third species that should be considered as one of the top 50 species. It is ranked as At Risk declining, the same as longfin eel and giant kokopu. This species forms by far the majority of the whitebait catch and is found in throughout New Zealand. Inanga, via its importance in the whitebait fishery, is of high interest to many New Zealanders and work to protect and enhance the abundance of this species will interest many people. It also allows the use of existing knowledge to achieve conservation gains

15. The Threatened Species Strategy on page 31 notes that the top 150 includes a full range of species *“to send a clear message that conservation needs to go beyond focusing on those species that are popular and appealing”*. The fact that the top 150 list includes just fourteen freshwater fish and no freshwater invertebrates, with much of the conservation effort concentrated in Otago, does not send a clear message that freshwater ecosystems are important, suggesting instead that there is little of concern in freshwater.

16. An example of a national-level tool to assist in halting the decline of threatened species could be the adoption of a national inanga spawning habitat prediction model (such as the one applied by ECan in the recent Plan Change 4) to provide Councils and other organisations with a clear pathway to better managing *potential* inanga spawning habitat, rather than the current approach of management only where known inanga spawning occurs (and thus maintaining this critical habitat at a level only to support a species in a declining state nationally).

### **Predator Free New Zealand**

17. The Society supports the goal of a predator free New Zealand. Page 3 of the Threatened Species Strategy sets out actions to be undertaken as part of the Predator free New Zealand strategy. We do note that this goal is for terrestrial environments and there is no similar intent for freshwater environments. A leading threat to native freshwater animals is introduced species including salmonids that are predators of New Zealand’s freshwater fauna. To halt and reverse the decline of many freshwater fish (and invertebrates) active management including removal of introduced predatory species, including salmonids, will be required.

18. The Society is well aware that salmonids are managed by Fish and Game Councils, not the Department. However, we submit that the Department and Fish & Game need to develop AND implement a control programme to reduce the impact of salmonids on threatened native species. This Threatened Species Strategy includes nine galaxiid species all of which are known or believed to be threatened by salmonids. Such a strategy does not need to fall under the Predator free New Zealand programme but a freshwater equivalent is required.

19. We also note the Threatened Species Strategy mentions by name introduced terrestrial predators, e.g., stoats, rats and possums. The Threatened Species Strategy, while noting freshwater species are threatened, never mentions the causes of these threats. As the Threatened Species Strategy is a national programme and advocacy tool, not just a work plan, we submit that the strategy should name salmonids as one of the significant threats to the freshwater fish listed in the top 150 species. It is also appropriate to acknowledge that salmonids impact on freshwater invertebrates. If New Zealand

continues to fail to acknowledge this issue, management actions acceptable to all parties are much harder to develop and implement.

### **Top 10 Actions**

20. **Action 1:** Predator free New Zealand is supported by the Society but currently is not relevant to freshwater threatened species.

21. **Action 2:** The Society supports the development of new methods and improving existing methods for predator control and submits that the development and improvement of tools for predator control in freshwater is included in this Action.

22. **Action 3:** This action is supported by the Society

23. **Action 4:** The Society supports this action as the invasion of freshwater by exotic species is a highly significant risk to the long-term survival of freshwater species. Recent biosecurity breaches such as the invasion of Didymo in New Zealand and the illegal introductions of coarse fish (e.g. rudd) to areas of the South Island show freshwater ecosystems and species are threatened by biosecurity breaches.

24. The Society submits biosecurity at the New Zealand's borders and internal biosecurity are both important conservation goals. At present, there are significant freshwater biosecurity and conservation threats present in both the North and South Islands. The Department has been leading the response to exotic freshwater fish introductions in the South Island but the illegal introduction of rudd to Lake lanthe on the West Coast and earlier introductions of gambusia, rudd, koi carp and trench in Nelson Marlborough, the Northland dune lakes and rudd to Lake Rotoiti indicate that active spread of exotic fish within the North Island and from the North Island to the South Island are a serious risk to freshwater ecosystems. The presence of Didymo in the majority of freshwater systems in the South Island represents a significant threat to North Island, Stewart Island and Chatham Island freshwater ecosystems and internal biosecurity is important to halt or at least slow the spread of exotic species.

25. **Action 5:** The Society supports the action to progress regulatory reforms. In particular the Society submits that the National Policy Statement for Indigenous Biodiversity is completed and that it contains specific freshwater objectives and policies aimed at halting the decline of threatened freshwater fish and invertebrates.

26. **Action 6:** The goal to implement freshwater reforms, environmental limits and habitat restoration are valuable. However, when the freshwater fish species listed in the Threatened Species Strategy are considered, these reform goals will have limited ability to address a major threat process, the impact of introduced salmonids on native fish and the continued destruction of critical spawning habitat for species such as inanga.

27. The Section *Foundations for Recovery* (page 18) has a small note regarding freshwater reforms. This includes the sentence "*The National Policy Statement for Freshwater Management 2014 directs councils to set objectives to safeguard the life-supporting capacity and indigenous species of fresh water*". The Society notes that recent government proposals to amend the NPS include the need for councils to *consider economic issues* and we have already submitted this weakens the ability of the NPS to protect

threatened species, alongside the lack of direction with regards to threatened species and methods to determine the current state of freshwater ecosystem health values relevant to native fish.

28. The Society submits that the Department should seek reforms that provide greater legal protection for freshwater organisms including full protection for at least the most threatened freshwater species as is the case for New Zealand's marine mammals, birds and reptiles. We also submit the Department should make greater use of existing tools such as Water Conservation Orders to protect habitat and as the Threatened Species Strategy focuses on freshwater fish the use of Fisheries Management Plans and this should be noted in this Threatened Species Strategy in Action 6.

29. Action 6 also includes the continuation of freshwater habitat restoration. It has been the experience of Society members that this restoration process is very slow and is well outpaced by the habitat degradation that is occurring around New Zealand. We submit that a much greater effort must be made to identify and restore critical habitats of freshwater fish to have any chance of being successful. The Spotlight report on Page 15 notes the five freshwater restoration programmes underway (the Living Waters partnership) including Waituna Creek in Southland. This Spotlight report notes the intention to restore 5 km of Waituna Creek, however after several years work no restoration work has been undertaken due to difficulties with land ownership and conflicting aims of river drainage requirements and habitat restoration. In addition, as the 5 km of targeted restoration habitat is in the very lower reaches of Waituna Creek the reach will still be subject to nutrient and suspended sediment releases from upstream agricultural land that will limit the successful restoration of the lower reaches. We also note that downstream of the restoration reach is the Waituna Wetland, a RAMSAR wetland site and this too will still be subject to the effects of upstream activities. This demonstrates the Society's concern that restoration actions are limited, slow to progress and success will not achieve full restoration nor currently protect or halt the decline of nationally significant freshwater habitats.

30. **Action 7:** The Society noted above that 50% of the freshwater fish listed in the Threat Strategy are non-migratory galaxiids restricted to Otago. We submit that the Otago region be recognized as a biodiversity hotspot for freshwater fish. We also recommend that the Department support research to determine if similar species diversity exists in freshwater invertebrate taxa in Otago.

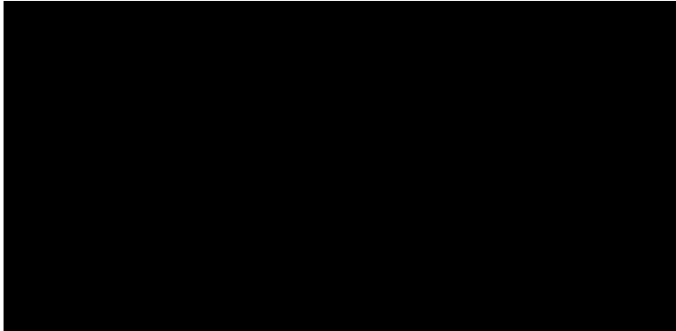
31. **Action 8:** The Society supports the action to select 500 data deficient species for scientific work and strongly recommends this includes a number of freshwater invertebrates.

32. **Action 9:** The Society supports the action that national recovery planning is able to integrate mātauranga Māori into threatened species management

33. **Action 10:** The Society supports the development of comprehensive monitoring that can be used by all parties undertaking threatened species management. We do note this action includes a trigger for intervention to avoid extinction. We do have concerns that intervention actions for freshwater flora and fauna are poorly developed and while monitoring is already showing the freshwater fish in this strategy are in major decline, intervention methods and actions are rarely being undertaken and few populations of seriously threatened freshwater fish are being protected.

## Conclusion

34. The Society is in support of the Department of Conservation's Threatened Species Strategy. However, we are concerned about the limited freshwater scope of the strategy and that it appears to under estimate the need for freshwater conservation action on a national scale. The Society recommends that the Department develop and action a major flagship programme for freshwater conservation. We recognize that to achieve the desired conservation outcomes for just the threatened freshwater fish in the Threatened Species Strategy the Department requires additional resources to halt the decline of these threatened freshwater species.



**Submissions Coordinator**

**For the New Zealand Freshwater Science Society**



# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

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Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
(if on behalf of an organisation)

Email:

Signature:  
(we accept a typed signature if  
no electronic signature)

[REDACTED]

Te Ātiawa o Te Waka-a-Māui Trust

[REDACTED]

[REDACTED]

## Submission:

### You can answer all or some of the questions.

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

Te Ātiawa is satisfied that the proposal accurately captures a portion of the desired future for our endangered taonga. However, there is some vagueness around the inclusion of iwi beliefs and traditions around the reporting and decision-making around some aspects that make us feel uncomfortable.

2: Are there additional aspects that you think should be included in the vision?

Sadly, we believe that there is an element that is missing from the strategy that must be included. Recent events in Te Tau Ihu have shown that the actions of some individuals can seriously undo the efforts of many organisations in conservation efforts. We believe that the strategy should also include a review of the offences/penalties sections of the relevant legislation with a mind to increase the maximum penalties for wilful destruction of habitat and species.

3: Do you agree with the characterisation of the value and current state of our native species?

Te Ātiawa are somewhat supportive of the depiction of our native species in the strategy document but our views are that the situation is more dire for many more of our native species. In addition, the value to Te Ātiawa of our taonga are higher than the document articulates.

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

We believe some of the tools identified in the document are correct but we have concerns about the others. As discussed above, we feel that ‘penalties’ should be added to the tool list as, sadly, some individuals in our society have actively and purposefully destroyed significant habitat and fauna out their own arrogant self-interest and/or private benefit. Revision of the existing penalties as a deterrent is preferable. Te Ātiawa has serious concerns regarding the use of biocontrol’s and consider much more consultation with iwi necessary before a decision is made on this tool. The tool of ‘prioritisation’ is irksome for Te Ātiawa and our concerns regard the application of an economic type model being applied to conservation management. In general, Te Ātiawa is supportive of the: Recovery Planning; Captive Management; Fenced Sanctuaries; Seed banking; Translocations; Regulation; and Biosecurity but we are uncomfortable with the vagueness of some of the supporting detail.

5: Are there other tools we could use to help us achieve the vision?

Sadly, some individuals within our society consider it their individual right to destroy important habitat and species within and adjacent to the conservation estate. Also, there are those that would do the same within private property. More should be done

to ensure these individuals are prosecuted to the full extent of the law and the punishment should reflect not only the long-term setbacks that these actions do to our natural heritage but also the time, resources, and efforts that groups have put into the restoration and protection of these taonga but also reflect the damage done to iwi values. Clearly the current penalties are insufficient to act as a deterrent.

6: Will the proposed goals help us achieve the vision and assess our progress?

Te Ātiawa believe that some of the goals will be achieved through the stated visions but the devil lies in the detail and the powers, resourcing and motivation of the operational level of staff that must do the work.

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

Goal four should be expanded to include a wider research aim, not just limited to understanding data deficient species but adding species interaction and habitat restoration research. The national science challenges have an insufficient brief to do such work.

8: Have we identified the right strategic themes?

Te Ātiawa have a concern that the lifting efforts and actions to a large-scale effort, the small-scale work will suffer. Often the two (small and large scale) are related and efforts on too large a scale may be ineffectual and inefficient. Te Ātiawa has a concern that the partnership approach may be diluting the crown's responsibilities, both in resourcing and accountability. Whilst we can understand the logic behind the theme, conservation is a core responsibility of the crown and critical obligation under the Treaty of Waitangi. Te Ātiawa strongly supports the theme in focusing beyond conservation land.

9: Do you agree with our top 10 actions?

Te Ātiawa agrees with the 10 actions providing they are adequately resourced so that they can be achieved. They are also broad and lack specific detail and would expect iwi to be involved in the finer detail of each of the actions.

10: Are there any other actions that should be included, and any actions that should be removed

A review of the offences and penalties should be undertaken as a top ten priority for reasons already explained above.

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right • **Too few**

**Comments:**

12: Have we identified the right priority species?

Yes but there are always more that can be added to the list.

13: Do you think other species should be prioritised ahead of the ones listed? And why?

We must start somewhere.

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

**Only if adequately resourced and powers afforded to operational staff to act.**

15: Do you have any further comments regarding the draft Strategy that is not covered above?

Te Ātiawa is generally supportive of the strategy in principle. There is still a great deal of detail that needs to be fed into the themes, goals and strategies. Te Ātiawa is surprised that iwi have not been more engaged in the development of this strategy. It is hoped that if this strategy is to be progressed, that considerably more consultation is undertaken by the crown or the Department of Conservation especially given the rights afforded (and assured) under recent Deeds of Settlement.

As always, lofty goals and strategies are only as good as the resources that are put behind them. Te Ātiawa has seen the continual restructuring and reduction in resourcing of the Department of Conservation while other central government agencies are grown and resourced for the exploitation of our lands and resources. If this strategy is to be given any chance of success then it must be adequately resourced by the government and given powers to protect and restore.

Conservation is a core responsibility of the government and obligation under the Treaty of Waitangi, it is about time that this (strategy) and other conservation initiatives are given the priority they deserve.

**Submission:****You can answer all or some of the questions.**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

We support the need for a threatened species strategy and commend DOC on writing this document, which is a good stimulus for discussion. However, we would like to see more ambitious targets, for example:

- that all currently threatened species of reptiles and frogs are down-listed by at least one step within a time-frame that is feasible given the life-history of that species (e.g. to move from nationally critical to nationally endangered within a biologically feasible time-frame)
- that no at-risk species move into the threatened categories
- and that the majority of data-deficient species are formally classified.

2: Are there additional aspects that you think should be included in the vision?

- We seek attention within the “predator-free” vision on **ways of controlling the effects of all mammalian predators, including mice, hedgehogs, cats, ferrets and weasels on the NZ herpetofauna**. These five species are not currently included as targets in the vision, yet are known to be capable of attacking and killing lizards (in large numbers, in many if not all cases). Furthermore, as predators such as rats and stoats are controlled, there is the potential for harmful effects on native reptiles and frogs to *increase* if the remaining mammalian predators increase in abundance and/or switch their prey. We need to know more about the contexts in which any and all mammalian predators cause harm to native reptiles and frogs. We also need to know which native species are the most vulnerable (noting that small body size and slow rates of reproduction may make our native lizards and frogs uniquely vulnerable). We also need to know more about how to control or eliminate these threats; this will, for example, require research to address mouse control at the landscape level, and a direct engagement with the NZ public about managing cat populations in urban areas. In short, in as many cases as possible, we would like to see control of the full range of mammalian predators (rather than just a subset of predators) at sites where threatened species of reptiles and frogs are present.
- We seek **greater protection of existing natural habitats of reptiles and frogs from land “development” that is currently occurring**. Recognised threats include increased urbanisation pressures (e.g. from housing and road-building), as well as land conversion for forestry, farming, hydroelectric developments and mining. A case in point is the coal mine approved for the Denniston Plateau, which is reported to have had the largest known population of the West Coast green gecko *Naultinus tuberculatus* (rated as Nationally Vulnerable) as well as other lizard species rated as

At Risk. It is not acceptable or sustainable to keep putting short-term economic rewards ahead of irreversible destruction of native habitat for protected species. If, despite these concerns, “development” does proceed, mitigation or compensation measures need to be adequate and successful over the long-term to ensure that there is no net loss in populations of native lizards and frogs.

- We seek greater recognition of the need of our country **to move now to a low-carbon economy** to curtail the worst potential effects of climate change on NZ biodiversity in the longer-term. The potential consequences include the direct effects of increased temperatures, increased drought (in some areas), extreme weather events and rising sea levels leading to loss of habitat. We note that increased storm surges already appear to have contributed to loss of habitat resulting in a salvage operation for the cobble skink, *Oligosoma* aff. *infrapunctatum* “cobble” (Nationally Critical). However, the potential consequences go beyond these direct effects, and may include increased vulnerability to existing mammalian predators, the establishment of new pest species (e.g. predatory ants), loss of habitat from wildfires or from climate-mitigation efforts such as increased afforestation, new species interactions if pressure is put on NZ to support assisted colonisation proposals for overseas species, and further loss of habitat from a probable increase in human immigration (climate refugees). Furthermore, as the direct effects of climate change on human populations mount, there is a real risk of reduced resources and motivation for conservation. In short, now is the time to act to minimise the harmful and accumulating effects: we cannot afford to allow greenhouse gas levels to continue to rise. This requires reducing our own country’s emissions, and supporting international efforts to reduce emissions globally at a much faster rate than has occurred to date.

### 3: Do you agree with the characterisation of the value and current state of our native species?

We agree that the document makes a persuasive case for the value of our native species in general. We believe that the current worrying state of our native reptile and frog populations could be more strongly highlighted by acknowledging (i) the number of species that have remained in the Threatened category over recent years, despite management in some cases, and (ii) the very high proportion of species in At Risk categories. In addition to the 35% of reptiles – species or proposed species – that are rated as Threatened as in the graphic on p. 12 of the strategy, a further 49% are rated as At Risk, and about half of these are placed in the sub-category of Declining. Only 10 out of 106 species are rated as Not Threatened (i.e. neither Threatened nor At Risk). This reality should be acknowledged in the strategy.

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

We are unsure of the specific management approach that is being applied, or will be applied, for threatened species. Among the uncertainties are exactly what is meant by “enhanced national population” (p. 29) in relation to the categories of the Threat Classification System, and what the specific role of (or alternative to) recovery plans will be. Recent years have seen the disappearance of several recovery plans and recovery groups for reptile species, despite recognition that these led to conservation successes. It has become difficult for members of our society to get a clear picture of the recovery actions now being carried out for some threatened species, and of the success of those actions. Yet recovery groups continue to exist for some birds, and the strategy (p. 20) suggests that recovery groups are still compatible with the proposed Natural Heritage Specialist Groups. We would like to see greater clarity around DOC’s intentions in this area. **Specifically, we believe that brief on-line plans/strategies (with time-bound goals and actions, and annual reporting) should be publically available** for all threatened and other species that DOC is actively managing.

5: Are there other tools we could use to help us achieve the vision?

In a more general discussion of resources, it is important to recognize the value of DOC staff. We believe that staff of the department work very hard in a challenging environment with insufficient resources. We would like to see **more recognition of the importance of valuing, adequately resourcing and increasing the staff of the department.** In addition to enhancing the speed with which threats to species can be tackled, increasing the department’s staff will provide employment opportunities for the up-and-coming generation of conservation biologists who have new ideas to offer yet struggle to get a foot in the door.

One ‘tool’ that could immediately be used to access more resources for conservation is to **levy overseas tourists.** We cannot understand why this has not already happened to help protect the biological resources that those same tourists put pressure on and come to see. Those of us who have travelled overseas and paid to access sites of high value to biodiversity see no reason why such a levy would not be accepted. We also think that a **higher tax contribution from high-income New Zealanders** is needed – and likely to be acceptable – to help DOC provide the leadership and momentum needed to improve the situation for threatened species. Heavier taxes on industries that destroy habitat of native species should also be explored.

6: Will the proposed goals help us achieve the vision and assess our progress?

As noted above, we seek greater clarity about what is meant by “enhanced national population”. For example, does it mean downlisting within the Threat Classification System, and does it mean protecting the full range of genetic diversity that currently exists within

the taxon? With regard to research, we support the value of new research in general, especially research that has the potential to lead to improved management, and think that this goal should not be limited to a select number of data-deficient species.

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

See above.

8: Have we identified the right strategic themes?

The “United against invaders” theme needs to **address a broader range of invaders**, including mice, hedgehogs and urban (as well as feral) cats. In terms of the “ecosystem management theme”, **New Zealanders need to be assisted to address and resolve value conflicts** between pressures from ultimately unsustainable “development”, such as coal-mining and urban expansion, and protection of the habitats of native species. In terms of “Building our science and knowledge base” and “Working together in partnerships”, a **more efficient and researcher-friendly permitting system is needed**.

9: Do you agree with our top 10 actions?

We believe that the most important and urgent action to assist NZ’s threatened species is **to provide increased funding for the Department of Conservation**. This is needed to restore the Department’s role in providing strong, nationally cohesive leadership and to achieve more ambitious goals in the management of threatened species.

Action points 1 and 2 need explicitly to include the full range of mammalian predators in New Zealand, including mice, hedgehogs, cats, ferrets and weasels.

Regarding Action point 8, the selection of 500 Data-Deficient species will need to be accompanied by significant core DOC funding to implement the goal.

10: Are there any other actions that should be included, and any actions that should be removed?

See 9. above and points made elsewhere in this submission. For example, there needs to be a specific action point to assess the potential for negative effects of climate change, and identify the most vulnerable native species. Crucially, there needs to be an explicit commitment to transition to a low-carbon economy, e.g. as outlined by the Royal Society of New Zealand in their 2016 report.



We also record our support for the Department of Conservation's use of 1080 for pest control, and emphasise the importance of protecting lizard species in and near cities (where most of the human population lives) as well as on agricultural land.

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right • Too few

Too few.

### Comments:

12: Have we identified the right priority species?

We are extremely concerned for many of the dozens of species of lizards, and 2-3 species of frogs, that are classed as Threatened or At Risk and that are not on the list of 150 priority species. For example, the Tautuku gecko (*Mokopirirakau* sp. 'southern forest') is classed as Nationally Endangered but is not on the list. Only two sites of occurrence are now known, both on private land, and they receive no pest control. Detection rates for the geckos are alarmingly low – one of our members reports that only 13 geckos have been sighted in about 150 person-hours of work over the past two years.

We would like to see priority given to all taxa rated as Nationally Critical, Nationally Endangered or Data Deficient. We would also like to see included a selection of species that are rated as Vulnerable or At-Risk-Declining, especially those that may be in regions or habitats where harmful effects of climate change might be felt soonest. We also seek assurance that proposed species newly recognized and listed as Threatened in the 2015 Threat Classification listings are included.

13: Do you think other species should be prioritised ahead of the ones listed? And why?

See the above comments.

Specifically, we wish to see the Tautuku gecko (*Mokopirirakau* sp. 'southern forest') added to the list of priority species.

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

We are not confident that the strategy is sufficiently ambitious or specific to prevent further declines and extinctions.

As another example, the statement of p 31 that “DOC will continue to monitor those threatened species that are not being actively managed and will react if there is a threat of extinction” is of concern. Species that have been classed as “threatened” are, by definition, already threatened with extinction. The statement seems to be saying that DOC accepts that some threatened species will not receive close attention and will be allowed to go extinct, an approach that we do not support.

15: Do you have any further comments regarding the draft Strategy that are not covered above?

We are puzzled by the reference on p. 36 to named conservation success stories such as that of tuatara having reached “a happy ending”. It is certainly true that achievements have arisen for tuatara from eradication of Pacific rats on offshore islands, and from translocations to a handful of islands. However, these have not restored the tuatara to anything like their pre-human range. Further work is needed to, among other things, establish the viability of existing natural populations on small islands, establish whether the species can be successfully maintained in the long-term at mainland sites and to set priorities for future translocations in the context of climate change. Given the long life spans of most NZ reptiles and frogs, and global issues such as climate change and human population pressure, we believe that the challenges of conservation management and need for monitoring will be ongoing.

It might seem a semantic nicety, but we would like to see greater ecological accuracy than the term “predator free” proposes. This term is used widely throughout the document, yet it is clear that only a few species of mammalian predators are being considered. Furthermore, if one took a literal interpretation of bullet point 4 of action statement 1 on p 40, it would mean that all native reptiles and frogs are targeted for extermination, given that all are predators! We hope that, with time, greater ecological awareness will lead to more accurate terminology and to a wider brief (including control of mice, hedgehogs and cats).

Overall, we would like to see an explicit declaration by the department in the strategy that it continues to see itself, not just as a broker of partnerships and teams, but **as a provider of nationally coordinated leadership in conservation science and management**. DOC is the statutory authority for conservation management and we look to the department to provide strong and nationally coordinated leadership. We support more resourcing for the department’s hard-working staff to help achieve this for reptiles, frogs and other elements of native biota.



**From:** [Redacted]  
**Sent:** Monday, 31 July 2017 2:21 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Name:** [Redacted]  
**Organisation:** [Redacted]  
**Email:** [Redacted]

- q1:
- q2:
- q3:
- q4:
- q5:
- q6:
- q7:
- q8:
- q9:
- q10:
- q11: aboutright
- q11comments:

q12: No. I think the candidate species list was too narrow in that only species managed in 2015/16 were included. The risk is that the right priority species selects only from what DOC currently work on, when there are likely species we should be working on but don't. It potentially doesn't include species where other organisations work on them, so DOC doesn't need to. The approach in the strategy is also only to include species that DOC manages for security, whereas many important species aren't managed for security because more information is needed to inform management. If we only focus on species where we know how to manage (or we are managing by research), how will we progress species research leading to being able to manage these species? The category 'notable' also needs clear criteria because otherwise that list will just be what a few DOC staff say is 'notable'. For example, who says yellow-eyed penguin is more notable than a species of crested penguin, and why? It needs criteria to justify inclusion and exclusion. The list should also be cross referenced back to species groups taxonomically to ensure there are representatives of all families/genus, at least in the candidate list. For example, I'm not sure that a Eudyptes penguin species made it to the candidate list, yet New Zealand is the world's stronghold for crested penguins, and a high proportion of those in NZ are endemic and highly threatened.

- q13:
- q14:
- q15:

# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
(if on behalf of an organisation)

Email:

Signature:

(we accept a typed signature if  
no electronic signature)

[REDACTED]

[REDACTED]

Brook Waimarama Sanctuary Trust

[REDACTED]

[REDACTED]

**Submission:**

**You can answer all or some of the questions.**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

BWST. The so-called vision is not really a vision. We would have expected to see a succinct statement of what is aimed to be achieved in terms of the big overview picture, which would also hopefully inspire people to be part of it.

2: Are there additional aspects that you think should be included in the vision?

3: Do you agree with the characterisation of the value and current state of our native species?

BWST. Yes

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

BWST. Yes happy that the right tools have been identified. However, we firmly believe that fenced sanctuaries can offer much more than the two paragraphs suggest. There is reference to returning threatened species “to parts of their former range” but we consider that the scale of this is much more significant than suggested by this comment as the attached shows. It is also possible to quantify the “made more accessible for the New Zealand public to experience” to identify the major opportunity provided here. The seven sanctuaries listed in the attached table have over 850,000 visitors annually and a further 20,000+ students through educational programmes.

Fenced sanctuaries can also make other contributions towards achieving the Strategy by:

- Serving as breeding nurseries for threatened species to help with translocations to other areas and to also provide species for adjoining halo areas as illustrated in the spotlight feature “Key to the city” and thus assist with achieving the Predator Free 2050 vision, wider landscape conservation and other goals of this strategy.
- Acting as a accessible shop windows to show people the benefits of a predator-free site to excite them about Predator Free 2050
- Providing a wide range of research opportunities to help fill the information gaps, including on individual threatened species and ecosystem management.

- Provide opportunities for community involvement in practical conservation and the training of such volunteers as well as of professional staff.
- Inspire citizens to undertake predator trapping and weeding in halo areas outside of the fenced sanctuaries.
- Provide education opportunities on our unique flora and fauna, threatened species and what we need to do ensure their survival.

5: Are there other tools we could use to help us achieve the vision?

6: Will the proposed goals help us achieve the vision and assess our progress?

BWST. Yes, provided there is adequate funding. When the BWS is cleared of predators we plan to re-introduce a rather long list of species including many that are included in the 150 priority threatened and at risk in the draft strategy. These include nationally critical species such as rowi, takahe and perhaps even kakapo, along with nationally vulnerable species such as whio, mohua, South Island kaka, long-tailed bat and the nationally endangered Southern short-tailed bat. Also on our potential list are at risk species such as tieke (SI saddleback), tuatara, little spotted kiwi and possibly North Island kokako or perhaps even the South Island kokako as there have been some recent sightings and signs in the vicinity of the sanctuary.

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

8: Have we identified the right strategic themes?

BWST. Fenced sanctuaries are able to make major contributions to all the five strategic themes in the proposed strategy and thus we firmly believe that they have a major role in achieving the proposed strategy with respect to terrestrial and freshwater species. These are outlined in our comments on question 4 above.

We can see huge benefits in the establishment of a network of fenced sanctuaries throughout both the North and South islands that encompass a range of indigenous ecosystems and biodiversity hotspots and are geographically spread. Where possible having such fenced sanctuaries relatively close to population centres can help facilitate their development and enable the necessary community involvement. We would like to see reference and acknowledgement to this strategic role of fenced sanctuaries mentioned in the strategic themes and other sections of the strategy, including reference to partnerships with existing and developing sanctuaries and the Sanctuaries of New Zealand Inc. (SONZ) and Fenced Sanctuaries Collective.

9: Do you agree with our top 10 actions?

BWST. Yes agree with them.

10: Are there any other actions that should be included, and any actions that should be removed?

BWST: Would also like to see reference in the actions to support for fenced sanctuaries.

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right • Too few

**Comments:**

12: Have we identified the right priority species?

13: Do you think other species should be prioritised ahead of the ones listed? And why?

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

15: Do you have any further comments regarding the draft Strategy that is not covered above?

BWST. Ongoing and adequate funding commitments by Government is needed to help lever financial contributions from other sources if the strategy is to be achieved.

## Fenced Sanctuaries Collective - Summary of Annual Outcomes May 2016

Compiled by [REDACTED]

### Species Persistence - Iconic species for which safe habitat is provided.

<p>Orokonui Ecosanctuary</p>	<p><i>Introduced</i>            South Island kaka (NE)            Haast tokoeka kiwi (NC)            South Island robin (NL)            Fernbird (NE)            Tuatara (AR R)            Otago jewelled gecko (AR)            Otago skink (NC)            Green skink (AR GD)            Takahe (NC)            13 rare plants</p> <p><i>Assisted self colonisation</i>            Fernbird</p> <p><i>Naturally present</i>            Rifleman (D)            Falcon (NT)            Tui            Bellbird            Kereru            Tomtit            Fantail            Waxeye            Kingfisher            Ruru            Peripatus (V)</p> <p>11 species of native freshwater fish</p>
<p>Zealandia</p>	<p>183 native plant species including 30 reintroduced locally rare species            44 native animal species excluding an unknown number of invertebrates;</p> <p><i>Naturally resident species threatened in status include:</i>            pied shag, Bush falcon, long-fin eel, Barking gecko, Ngahere gecko, ornate skink, Brown skink, peripatus; naturally uncommon species include Black shag, Little shag and Little black shag;</p> <p><i>Reintroduced birds successfully established:</i>            Little spotted kiwi            NI kaka            NI saddleback            NI robin            NI bellbird            Whitehead            Hihi/stitchbird            Kereru</p>



	<p>Red-crowned parakeet SI takahe Brown teal NZ scaup</p> <p><i>Reintroduced frogs and reptiles:</i> Maud Island frog Cook Strait tuatara Spotted skink</p> <p><i>Reintroduced mega-invertebrate:</i> Cook Strait giant weta</p>
Rotokare	<p><i>Reintroduced:</i> Western Brown Kiwi (NV RR) North Island Saddleback (AR R) Whitehead (RR) <i>Dactylanthus taylorii</i> (NV D)</p> <p><i>Naturally present</i> North Island Robin (RR) NZ falcon (NT) NI Fernbird (AR D) Spotless crane (AR R) Gold-stripe gecko (AR R) Forest gecko (AR D) Ornate skink (AR D) Brown skink (AR D) Peripatus x 2 spp. (V) Long-fin eel (AR D) Long-tail bat (NV) <i>Brachyglottis kirkii</i> (AR D)</p>
Maungatautari	<p><i>Re-introduced:</i> kaka, kiwi, NI robin, YC kakariki, saddleback, hihi, kokako, whitehead, takahe, tuatara, Mahoenui weta, galaxius spp,</p> <p><i>Naturally Present:</i> Falcon, spotted crane, ruru, tui, kingfisher, bellbird, kereru, tomtit, fantail, waxeye and swallow 6 reptiles</p>
The Brook Waimarama	<p><i>Naturally present</i> Red crowned parakeet (relict) Forest gecko Nelson green gecko 15 rare plants</p>
Shakespear	<p><i>Reintroduced</i> NI robin (RR) Whitehead (RR) <i>Ileostylus micranthus</i> (AR NU) <i>Coprosma acerosa</i> (AR D)</p> <p><i>Assisted self colonisation</i> Fluttering shearwater (AR R) Northern diving petrel (AR R, RR) Brown teal/pateke (AR R)</p> <p><i>Naturally Present</i></p>

	<p>Forest gecko (AR D)  Moko skink (AR R, RR)  Ornate skink (AR D)  Pacific gecko (AR R)  Bellbird (NT, RR)  Northern blue penguin (AR, D)  Grey faced petrel (NT, RR)  Banded rail ( AR D)  Spotless Crake (AR R)  Pied stilt (AR D)  Red crowned parakeet (AR R)  Korthalsella salicornioides (AR NU)  Pimelea orthia (NC)  Pingao (AR D)</p>
Tawharanui	<p><i>Reintroduced</i></p> <p>Forest gecko (AR D)  Auckland green gecko (AR D)  Ornate skink (AR D)  NI saddleback (AR R)  Brown teal/pateke (AR R)  Red crowned parakeet (AR R)  NI robin (RR)  Whitehead (RR)  NI takahe (NC)  NI brown kiwi (NV, RR)  <i>Ileostylus micranthus</i> (AR NU)</p> <p><i>Assisted self colonisation</i></p> <p>Bellbird (NT, RR)  NI kaka (NV)  Grey faced petrel (NT, RR)  Long-tailed cuckoo (AR)  Bittern (NE)</p> <p><i>Naturally Present</i></p> <p>Northern blue penguin (AR, D)  Banded rail ( AR D)  Spotless Crake (AR R)  Red Billed Gull (NV)  Pied stilt (AR D)  White fronted tern (AR D)  Forest gecko (AR D)  Auckland green gecko (AR D)  <i>Brachyglottis kirkii</i> (AR D)  <i>Centipeda minima</i> (NE)  <i>Streblus bankssii</i> (AR R)  <i>Pomaderris hamiltonii</i> (AR NU)  <i>Coprosma acerosa</i> (AR D)  Pingao (AR D)</p>

Risk classification

- AR = At risk
- AR GD = At risk, gradual decline
- AR R = At risk, relic
- D = Declining
- NC = Nationally critical
- NE = Nationally endangered
- NL = Not listed
- NT = Near threatened
- RR = Regionally rare
- V = Vulnerable

# New Zealand's Threatened Species Strategy: submissions for consultation

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## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter or contact person:	[REDACTED]
Organisation name: <i>(if on behalf of an organisation)</i>	Eastern Bay of Plenty Branch, Royal Forest and Bird Protection Society NZ Inc
Email:	[REDACTED]
Signature:	[REDACTED]
<i>(we accept a typed signature if no electronic signature)</i>	[REDACTED]

**Submission:**

**You can answer all or some of the questions.**

*1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?*

*2: Are there additional aspects that you think should be included in the vision?*

It is not clear what the 'vision' is for species not in the 150 to be enhanced. The Desired Future State by 2025 is for all threatened species to be managed for their survival. The urgent vision is that we do not allow any species to become extinct – Maui dolphin and fairy tern are in real danger of this happening.

In the meantime some species that have increased populations e.g. Northern NZ dotterel have their conservation reduced simply because volunteers have worked hard to achieve this, but this improvement is not sustainable without the volunteer effort continuing.

*3: Do you agree with the characterisation of the value and current state of our native species?*

Yes

*4: Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?*

Yes but some are not being applied to their fullest extent e.g. 1080 and regulation – dairy farms are still increasing and farmers destroying habitat in riverbeds on crown land' mining is being encouraged in natural areas on land and at sea.

*5: Are there other tools we could use to help us achieve the vision?*

Money (see below)

*6: Will the proposed goals help us achieve the vision and assess our progress?*

*7: Are there alternative goals that you think will better achieve the vision and assess our progress?*

No – there should be a goal to prevent any extinctions

*8: Have we identified the right strategic themes?*

*9: Do you agree with our top 10 actions?*

*10: Are there any other actions that should be included, and any actions that should be removed?*

Why 10?

The elephant in the room is the lack of agency action to control herbivores, especially deer and wallabies, and feral pigs that destroy the ground cover.

The message needs to start that these so called “valued introduced species” are in fact also pests, and have to be reduced in numbers, or in the case of wallabies, eradicated.

11: *Have we identified the right number of priority species?*

12: *Have we identified the right priority species?*

13: *Do you think other species should be prioritised ahead of the ones listed? And why?*

(Circle or highlight one) • Too many • About right • **Too few**

14: *Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?*

Its almost too little, too late. Why has this taken so long? DoC has been around for 30 years!

15: *Do you have any further comments regarding the draft Strategy that is not covered above?*

(i) What is going to happen to threatened species not being managed, and indeed, species that aren't currently threatened but in decline nevertheless?

(ii) Funding, funding, funding!

DoC needs to have its budget at least doubled, which could be partly funded from a visitor tax. But the government needs to increase its share of funding. The enormous amount of collaborative, philanthropic and voluntary effort that is happening needs to be compared to what the government is investing.

DoC's “good news” stories (including in the strategy document), are giving the public a false impression that the government is doing well yet we know this is far from the truth. New and potentially disastrous challenges are emerging - trap and bait shyness, some of which arises from volunteer/contractor imprecision.

(iii) Volunteer burnout is another threat to the current reliance on community volunteers which this branch of Forest and Bird has experienced and observed in others. Whilst some volunteers continue active into their 60s, 70s and older, not all retired people have the physical and health required for this type of work. Most contractors on conservation land and in care groups are in

their fifties. There is low recruitment of young people to do trapping and maintain bait stations or planting and weeding, especially away from urban areas.

#### Conclusion

The branch supports much more extensive broad landscape scale pest control, as a methodology that is cost effective and allows for sustained control is essential to achieving conservation goals.



**From:** [Redacted]  
**Sent:** Monday, 31 July 2017 2:47 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Organisation:** [Redacted]

q1:  
q2: I would like to see some inclusion of future risk to species included in the algorithm or decision making. I don't see this being particularly evident in the algorithm or the discussion. Perhaps in some cases future risk is included in the threat status, but not for all of these conversations. I'm thinking about particular species that might be at risk of increased decline, or a change in threat status, with likely future threats such as climate warming and new disease risks. I also consider that Predator-Free will include increased risks for some species due to the nature of how Predator Free is defined. For example, taking rats, possums and mustelids out of an ecosystem may well release mice from predation creating an increased risk for invertebrates and lizards. I suspect one of the best places in this strategy to acknowledge this kind of risk is in the actions where comprehensive monitoring is proposed. However, this monitoring statement currently implies it will be comprehensive only for the listed species attracting species management. I also think many of the impacts from climate change and new diseases are unknown. Very few case studies exist for fauna, for example, for effects of climate warming. New diseases emerge without any backdrop of research on which to understand their impact. Another part of the strategy implies research will be critical to this strategy, but the actions only refer to techniques for removal of pests, not research into effects on our native fauna of removal of only some pests, for example.

- q3:
- q4:
- q5:
- q6:
- q7:
- q8:
- q9:
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# New Zealand's Threatened Species Strategy: submissions for consultation

#125

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
*(if on behalf of an organisation)*

Email:

Signature:

*(we accept a typed signature if  
no electronic signature)*





## Submission:

You can answer all or some of the questions.

### 1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

No – The proposed vision falls short of securing the future for threatened species in New Zealand.

The NZ Biodiversity Strategy states: *“To restore viable populations of all our threatened and at risk species across their natural range and maintain their genetic biodiversity.”*

I believe that this is necessary and this statement is not supported within the current vision. However it was echoed by the Parliamentary Commissioner for the Environment’s recent Report on the state of our native birds. *“The restoration of abundant, resilient and diverse species and habitats across their natural range.”* I therefore suggest that the strategy follow closely the recommendations from the PCE report.

In order to protect NZs threatened species the Strategy’s vision needs to aim to protect a far greater percentage than just 20% of our threatened and at risk species by 2030. The strategy must have the highest possible goal and be written to reflect a dedication to safeguard all of NZs threatened species.

All (100%) of NZ threatened and at risk species will be protected.

I support the importance of Predator Free 2050, Battle for our Birds and War on Weeds as operational management actions; however these initiatives are by no means enough alone to ensure the protection of all of NZ threatened species.

The vision for **Predator Free NZ by 2050** – is supported. However this needs to be expanded to include the other key introduced predators, especially feral cats, ferrets, weasels, mice, hedgehogs and dogs. Additionally deer, thar, goats and feral pigs are significant threats to some threatened species and therefore need to be included in action plans to restore threatened species.

**Battle for our Birds** is supported but needs to be expanded so that all of the public conservation land needing predator control is under regular sustained predator control. Certain threatened species, may not be gaining enough benefit from current predator control which primarily focuses on rats, possums and stoats. Moreover Battle for our Birds is focussed on beech forests while species in other habitats also urgently require protection from introduced predators.

In addition to predator control operations within the Public Conservation estate, effective landscape scale predator control on land outside of the conservation estate will also be needed.

While it is an important focussed campaign, the **War on Weeds** needs to increase its scope from just the *dirty dozen* as these represent less than 4% of the 350 weeds which are currently a threat in NZ.

The strategy fails to recognise the full range of factors that are contributing to the declines of NZ native species across all land tenures and environments.

The strategy needs to identify risks that will increase as a result of climate change predictions (pathogens, increases in range of already present introduced predators/ establishment of new introduced species) and outline and budget for the required management to reduce these risks.

The strategy recognises that there is a lot of data deficiency: 3000 species have not yet been given a conservation status, there is no knowledge about how to manage at least a further 3000 and there are tens

of thousands of species that have not been assessed - in addition to those not yet known. Actions, goals and funds are needed to address this huge knowledge gap.

## **2. Are there additional aspects that you think should be included in the vision?**

Yes, the following aspects should be included:

- Conservation actions for threatened marine species
- The need to halt the loss and fragmentation of habitats that support threatened species
- Increased emphasis on improving our knowledge of the threats to, and conservation status of, species.
- Consideration of climate change particularly building resilient ecosystems and populations to mitigate climate change.
- Requirement for all Government Agencies to implement the strategy.

The vision is focused on a proportion of land based threatened species and actions to assist them, however NZ marine species are also in urgent need of protection. Several sea bird species are threatened with extinction (globally seabirds are the most threatened group of birds) as well as marine mammals, fish and invertebrates. Only five out of 28 threatened sea birds are included in the 150 species listed in the strategy. Nineteen species of seabirds are at risk from fishing activities, as are Hookers sea lions and species of dolphin – this situation is not addressed in the strategy.

Habitat loss and fragmentation continue to increase the threat to many threatened species – this issue needs to be better recognised in the Strategy and feasible solutions to ensure habitats are better protected needs including.

Upon recognising the large number of species with not enough knowledge about them, let alone how to successfully manage them, the strategy then needs to provide a clear and budgeted plan as to how this knowledge gap will be filled, enabling effective conservation management of the species concerned.

As Climate change impacts become more pronounced both threatened species and introduced species will change their distributions. Therefore the strategy should include scenarios for different climate eventualities in order to be better prepared for managing threatened species in a changing climate.

It is unclear in the strategy *who* is tasked with doing the ever so important work of safe guarding NZ's threatened species. While community groups do great work it is still essential that the vision and actions of the Strategy are led by the NZ Government. All government agencies should have a responsibility under the Strategy to ensure that their policies and actions support the restoration of threatened and at risk species.

## **3. Do you agree with the characterisation of the value and current state of our native species?**

Yes – I agree with the value of our biodiversity.

The *Trouble in Paradise* section of the Strategy must recognise the impact of commercial and recreational fishing of threatened fresh water species, such as whitebait species and Long finned eels in addition to the predation of native freshwater fish from introduced trout. Moreover it must recognise the threat to fresh

water ecosystems from stock impacts to waterways and wetlands, the continued clearance and drainage of habitats of threatened species for development (agricultural, residential, commercial). Additionally this section needs to recognise the threats faced by threatened species in the NZ marine environment. Commercial fishing is a significant threat to many of NZ's marine threatened species both directly through by catch but also due to destructive methods such as bottom trawling which destroys the sea floor habitat and associated species.

The Strategy needs to recognise the threat that climate change poses to all NZ species and in particular to threatened species. They will be threatened and impacted on due to increased temperatures, changed hydrology, habitat loss, disruptions to the food chain, ocean acidification and warming and increased predation and disease.

The bar graph on page 12 does not represent the true status of percentages of species under threat as the "At Risk" species are excluded and the numbers of threatened and data deficient species are added into the total, therefore being double counted - consequently the graph shows a more positive situation regarding the percentage of threatened species by broad taxonomic group than is actually the case.

The information on bird species requires updating to correspond with their 2016 conservation status.

#### **4. Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?**

##### *Predator control tools*

Traps are effective across relatively small accessible sites, but should not take priority over 1080 unless they are more cost effective. I support the use of landscape scale aerial 1080 and support its ongoing use, alongside complementary research to increase its efficacy and reduce risks to non-target species.

All predator control tools (different trap models, aerial broadcast, bait type) require thorough field testing before deployment over large areas to reduce impacts on non-target species

##### *Recovery Planning*

The Strategy must clearly state that all critically threatened species that would benefit from detailed management plans have such plans in addition to specific recovery groups that oversee the development and implementation of the plans.

There is no time frame for the establishment of Natural Heritage Specialist Groups, this should be stated. Additionally the goal of the NHSGs is unclear, will they cover all 3000+ threatened and at risk species and their ecosystem, or all 800 threatened species and their ecosystems?

##### *Prioritisation of species recovery*

The emphasis placed on the need to prioritise between threatened species is weak as this is driven by the lack of resources, rather than the conservation need of different species. The prioritisation tools need to be designed to meet the NZ Biodiversity Strategy Goal 3: "*Maintain and restore a full range of remaining natural habitats and ecosystems to a healthy functioning state*" with emphasis on the full range, not a representative.

Incorporating threatened species management with ecosystem management is supported as this is more likely meet the goals of restoring threatened species across their natural range and halting the decline in our native species.

##### *Captive management*

The goal of the Strategy must be to conserve NZ threatened species within their natural habitats, conducting *in situ* conservation. Therefore Captive management should be included as a last resort tool

only if *in situ* management is not successful (which may become the case due to increased temperatures from Climate change).

#### *Fenced sanctuaries*

While fenced sanctuaries serve a useful purpose, they protect relatively small areas and should not be prioritised over *in situ* conservation of threatened species.

#### *Translocations*

Translocations are an important conservation to expand population ranges and increase genetic diversity in wild populations. However they are not without risk as was noted by the Parliamentary Commissioner for the Environment's recent report. Translocations are expensive and nearly always result in the loss of at best several individuals. Therefore the use of translocations must be evaluated relating to the conservation gain for each species against the benefit of using the same resources to provide *in situ* restoration of threatened species. A translocation policy is needed to ensure consistency, transparency and effectiveness of translocations and avoid species being released into areas of sub optimal habitat (habitat type and size, predator density).

#### *Regulation*

This section needs to clearly describe how existing and new legislation and regulation will be used and developed in order to achieve the goals of the Threatened Species Strategy.

I support the development of legislation for native threatened plant and habitat protection.

I support a greater use of legislation, regulation and policies to ensure that human actions do not further threaten species. Regulations are needed to require effective bycatch mitigation techniques, and a transition to modern, low impact, fishing techniques to achieve zero bycatch of threatened species.

I support the development of a National Policy Statement on indigenous biodiversity however this must set minimum requirements (effective at conserving species) for biodiversity protection on private land.

Good legislation is only the first step, in addition resources must be committed to ensure the monitoring and enforcement of existing legislation, policies and regulations at the central and regional and local government levels.

The Strategy does not clearly state its own goals in regard to safe guarding fresh water ecosystems and the threatened species within; rather it relies on Freshwater reforms. However the reforms such as the Clean Water Package 2017 are not robust enough to conserve the life-supporting capacity and indigenous species of fresh water, and groundwater is not included at all. Some bottom lines, particularly nitrate, have been set at levels which are toxic to aquatic life, thus reflecting ecological collapse as a threshold for acceptable water quality.

While the proposed changes to the NPS-FM 2014 (included in the Clean Water Package 2017) include non-binding targets for stock exclusion to waterways, they do not include any other types of habitat destruction, for example wetland drainage, dredging streams, riparian vegetation clearance, engineering structures such as dams, weirs and culverts all of which destroy freshwater habitat, including habitats of threatened species. Existing fresh water legislation is not working for our threatened species, therefore the Strategy should clearly define its own goals and actions and thresholds at a level effective ensure the conservation of freshwater ecosystems.

## 5. Are there other tools we could use to help us achieve the vision?

Yes.

The most important and effective tool is to ensure that the Department of Conservation is adequately funded to undertake all the management and informing research needed to restore all threatened and at risk species and to prevent others from becoming threatened.

The strategy should highlight the importance of keeping climate change to 1.5degC of warming (the aspirational goal of the Paris Agreement) in order to protect New Zealand's biodiversity

The strategy should recognise utilising the Crown's tenure review process in order to conserve the habitats of high country threatened species in Crown ownership and control.

The strategy must include clear methods to monitor the implementation and achievements of the strategy, and if not being met the readjustments must be made.

## 6. Will the proposed goals help us achieve the vision and assess our progress?

The proposed goals need to be more ambitious and align with the aspirational goals of Predator Free NZ.

There are no goals to achieve enhancing all of our threatened and at risk species, or increasing knowledge about the many data deficient species so that no species are data deficient.

Goal 4 fails to set a target for assessing data deficient species

## 7. Are there alternative goals that you think will better achieve the vision and assess our progress?

The following goals should be included:

- Enhance the populations of more than 50% of our threatened species so that they are under active conservation management by 2025.
- All threatened and conservation dependent species should be actively managed for recovery by 2030.
- Manage all threatened and at risk species that require conservation intervention for protection so that no species should become more threatened.
- Ensure that no species becomes extinct.
- Re assess the list of priority species from the full list of threatened and at risk species so that the not just the species currently under conservation management.
- Reduce by kill of threatened species.
- Select 230 of the already listed data deficient species every year and conduct the necessary research to fill knowledge gaps so that by 2030 there are no data deficient species.

- Assess 100 threatened species per annum to determine the conservation actions required so that by 2050 there are no threatened species without a conservation prescription.
- Include a goal to assess the remaining unassessed species to understand their conservation status.

## 8. Have we identified the right strategic themes?

I strongly agree that the Strategy and outlined actions need to be informed by research. However the priority species currently in the Strategy has not been determined based on science as the listed species have been taken from those that Department of Conservation is already working on, which has not necessarily been determined scientifically

The following additional themes should be included:

- Uniting all Government Agencies in an “all of government” response and commitment to threatened and at risk species.
- Building the needs of native species in climate change policy developments.

## 9. Do you agree with our top 10 actions?

Yes with the additions and amendments as listed below (number 10).

## 10 Are there any other actions that should be included, and any actions that should be removed?

Amend Action 2: Develop protocols to ensure that all trap designs and innovations are field tested to avoid non target deaths of at risk species prior to their deployment.

Amend Action 7: Identify and publish a portfolio of priority areas for threatened species including public conservation and privately owned land and develop and implement plans for their protection.

Amend Action 8: Select 230 data deficient species every year for assessment, develop conservation prescriptions for 100 threatened species per annum and carry out assessments of remaining unassessed species.

Amend Action 9: Ensure that national recovery planning systems integrate matauranga Maori and are implemented to achieve threatened species goals. Maintain recovery groups and establish recovery plans and groups for threatened species requiring specific management to restore their populations.

Add an action to: Identify and take opportunities to preferably purchase, or covenant habitats of threatened species.

Add an action to: Increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control by 2025.

Add an action to: Advocate to halt the destruction of habitats of threatened and at risk species.

### 11. Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right



#### Comments:

The number of priority threatened species identified needs to be driven by the conservation needs of the species to ensure that their populations are resilient and thriving rather than fitting the prioritisation to the current lack of resources/funds.

### 12. Have we identified the right priority species?

No.

Identification of the right priority species has been limited by only identifying them from amongst the species currently under conservation management, while there are several other threatened species which are not being managed.

There is a strong bias towards terrestrial species with marine species being represented.

Dry land and limestone threatened plants are poorly represented while certain species within this group are reduced to critical levels.

Fungi are not listed at all although 50 species were listed as nationally critical in 2002 and require urgent conservation management.

All the threatened species and those that are at risk and conservation dependent should be prioritised for enhancement by 2030

### 13. Do you think other species should be prioritised ahead of the ones listed? And why?

The algorithm used to determine the priority listing of the currently represented 150 species should be applied to all species, not just those that are currently being managed.

### 14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

No – The overall framework is seriously lacking in ambition when it comes to safe guarding the future of NZ's threatened and at risk species.

The vision and outlined actions only proposes to increase the populations of 150 out of 800 threatened species at risk of extinction, and manage 600 out of a further 2,200 species at risk of decline. The vast majority of threatened and at risk populations which require immediate conservation are not covered by the Strategy's proposals for action.

The Strategy fails to commit all government agencies to commit to meet the strategy's goals.

**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 2:57 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]

Organisation: [REDACTED]

Email: [REDACTED]

q1: No

q2: Currently the Vision does not read as a vision, but as a series of aims and objectives and lacks a defined future state.

q3: Yes

q4: Tools are good, but there are tools that are not included.

q5: Efficient and humane predator control and monitoring achievement.

q6: Goals are fine but it would be good to have some indication of how we will be able to recognise success. There are no goals specific to community partners.

q7: Something pertinent to empowering and enabling businesses, conservation groups and the community to undertake conservation works that support threatened species and their habitats.

The need to bring all of Government on board is recognised in the Strategy, but there is no commitment to ensuring that all agencies and territorial authorities will have to implement the strategy.

q8: Within the theme 'focusing beyond public conservation land' I was disappointed to see the explanation limited to less modified habitats on private land. The strategy should acknowledge the role modified landscapes may play in supporting threatened and other species, and also the vital role wildlife in urban areas play in facilitating nature engagement in our increasingly urbanised population of voters.

I support the working at scales and managing ecosystems approach, but would like some comment in the Strategy about how species that do not fit with this approach will be managed (or not).

q9: There is too much reliance on Predator Free 2050 as a mechanism to achieve goals. Pred-Free 2050 does not include significant predators in non-forested landscapes, such as cats (feral and domestic), ferrets, hedgehogs etc. Many of the Top 10 Actions are government actions and therefore will not inform those who wish to engage with this Strategy.

Action 8, as a researcher in the field of conservation biology, leaves me wondering exactly what is meant. Much of the kind of data collection that fills the current gaps is not research, but information gathering. Any kind of initiative like this needs funding.

I support the concept of identifying triggers for intervention, and would like to see a well-thought out set of reference points based on a precautionary approach that would function to trigger action before required actions become difficult and very expensive.

The actions need better consideration on what success looks like, and these details included in the action: i.e.

"Ensure that all national recovery planning systems incorporate the important principles of mātauranga Māori and are effective in enabling successful conservation management of 500 identified species such that by 2025 their populations are all assessed as stable.

q10: The top 10 actions have been described, which implies there are more; what are they?

q11: too few

q11comments: If the number of threatened species is 868, as indicated on page 12, then priority species should not be less than this figure. This is a conservative approach, as there are >3,000 each classified as data deficient or 'at risk'.



q12: Making lists like this is always difficult. In this case the list raises the following questions;

- 1) Will DOC stop current management of some species in order to work on these newly prioritised species?
  - 2) Will gaining a position on the list result in a species being managed and those not on the list will not be managed?
- One issue is that the species in this list frequently would not be encapsulated under the working at scale or managing ecosystems scale. As such, maybe this list is better viewed as additional species that will be managed outside of the EMU framework to secure them from extinction.

The weightings used in this algorithm could be adjusted to create more robust results: Not Threatened category should have a lower weighting (0.3? 0.1?) to reflect their being of no conservation concern. Currently it has the same weighting as Naturally Uncommon and we know that rarity predisposes a species to conservation risk, so the weighting for rare species should be higher than that for Not Threatened species. Species categorised as Recovering should have a lower weighting (0.5?) than those categorised as Declining as their conservation trajectory is markedly different. Species categorised as Naturally Uncommon and Relict should have the same weighting (0.5) as both are classified on the basis solely of limited area of occupancy without known threats to their persistence. Declining should have a higher weighting (0.6?) to distinguish it from the non-declining categories. Species Optimisation data could be used in the final selection of this list – particularly the balance of cost versus gains. Maybe the algorithm should select 500(?) species and then the Species Optimisation data be used to select the final 100.

There are also issues regarding taxonomic bias and over-represented groups that could be addressed.

Moreover, our knowledge of many species is insufficient to robustly evaluate them in this system. Therefore there needs to be a process of examining the confidence in the underlying information and regularly repeating this listing to encapsulate change. This process should be re-run every five years.

q13:

q14: No, because there are threatened species, at risk species, data deficient species and landscapes that fall outside what is covered in this strategy. I.e., the draft Threatened Species Strategy only aims to safe guard 20% (600 out of 3000) of our threatened and at risk species by 2030 and enhance the populations of 17% (136 spp out of 800 spp) of species that are in serious trouble, and 0.6% of those that are in some trouble, by 2025. There are a further 3,000 species for which we have no information on their status.

There is too much reliance on Predator Free 2050 to achieve goals relating to invasive species, especially since this initiative does not even acknowledge important pest species.

Responsibility for our native species lies not just with DOC, but also with MPI, LINZ, and MBIE. The activities of these agencies are frequently responsible for facilitating the demise of our native plants and wildlife. The need to bring all of Government on board is recognised in the Strategy, but there is no commitment to ensuring that all agencies and territorial authorities will have to implement the strategy. For example, we need MPI to protect, penguins, Hector's dolphins, sealions and Sea Birds.

q15: Too much reliance on the national Science Challenge for providing the information needed. The NSC has been presented as a platform for aspirational research, and much of the information required to manage species does not fall into the category of aspirational research. I don't see how the information required can be collected through the NSC.

# New Zealand's Threatened Species Strategy: submissions for consultation

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## Submissions must be received no later than 5 pm Monday 31 July 2017

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### Submitter details:

Name of submitter or contact person:	[REDACTED]
Organisation name: <i>(if on behalf of an organisation)</i>	NIWA
Email:	[REDACTED]
Signature: <i>(we accept a typed signature if no electronic signature)</i>	[REDACTED]



## **Submission:**

### **You can answer all or some of the questions.**

**1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

New Zealand has responsibilities for the protection of species and habitats across a vast marine area – and this is not reflected in the draft Strategy. The Vision needs to reflect the communities and agencies that have interests in the marine area as well as identifying the activities that are having greatest impacts on the preservation of marine organisms and the habitats they occupy.

It is important that the role of iwi is recognised throughout the Strategy across all domains.

**2: Are there additional aspects that you think should be included in the vision?**

There needs to be more attention paid to all aquatic organisms, and in particular marine species in addition to the marine mammals, seabirds currently identified.

**3: Do you agree with the characterisation of the value and current state of our native species?**

The statements of value and current state in relation to marine species is inadequate.

The tools that are discussed do not reflect all the options or approaches relevant to marine species and habitats, and only refer to options for marine species within the Regulations section. There is a need for further research on tools that encompass organisms in other habitat types (freshwater, marine) and facing specific types of threats.

There are possibilities for translocation and recovery plans for marine organisms, as well as significant biosecurity threats faced by marine communities/species, and the Strategy is currently silent on these issues.

A number of taxa play important roles in the conservation of aquatic threatened species through the provision of essential ecosystem functions and services, but there is no recognition of their role and value in this strategy. While it is currently inconceivable to have a species-specific strategy for all taxa, the key ecosystem functions that they provide to threatened species needs to be considered as part of the strategy; taking a whole-of-ecosystem approach would achieve this.

The use of “plants, animals and fungi” excludes Kingdoms of critical importance in marine systems, including the Chromista (with all brown algae and a number of important photosynthetic groups).

**5: Are there other tools we could use to help us achieve the vision?**

Protection of marine species and diversity requires additional approaches to those being employed for terrestrial species. Many marine species fall into the data deficient category and it is highly

unlikely that there will be adequate funding in the short or medium term for sufficient data to be gathered to more correctly assign threat status. For groups of organisms which predominate in the data deficient categories there is a need to reconsider how protection can be best achieved while species-specific knowledge is being built.

Internationally there is attention being focused on the protection of habitats, small natural features (SNFs) and vulnerable marine ecosystems (VMEs) in order to achieve better outcomes for protection of diversity and consequently species.

## 6: Will the proposed goals help us achieve the vision and assess our progress?

NZ's ability to report on the status of species and to assess progress towards the Vision of this Strategy rests of the quality of the data available. There are significant gaps in the documentation of the NZ biota, the state of the taxonomic workforce is fragile and numbers of experts declining, and there is a long way to go before the databases of natural history collections (housed in CRIs and Museums) are able to be freely accessed and interoperable.

A Threatened Species Strategy requires the best possible data on the biota. Significant work is still required on the discovery & documentation of the biota, from taxonomic placement and phylogenetic relationships through to ecology and distribution of species.

## 7: Are there alternative goals that you think will better achieve the vision and assess our progress?

Neither goal 1 nor goal 2 includes a marine focus.

There is no marine focused National Science Challenge that addresses biodiversity and threatened species, or the threat posed to marine species by the introduction of pest species, and no additional funding is going to address the many 1000s of data deficient species in the marine environment.

## 8: Have we identified the right strategic themes?

Agree with the themes "managing ecosystems at scale to protect species" and "building our science and knowledge base". In theme "focusing beyond public conservation land" it is important to make sure this includes representation of marine issues – and for example, the Biodiversity Collaborative Group also addresses aquatic as well as terrestrial issues (including the connectivity or interface between freshwater and marine environments).

## 9: Do you agree with our top 10 actions?

1-3. largely exclude marine & freshwater

4. Support Biosecurity 2025 (although this a very terrestrially focused policy approach)

5. Support – provided that the Indigenous Biodiversity Collaborative Group actually includes representation of aquatic systems and organisms

6-10. support

10: Are there any other actions that should be included, and any actions that should be removed?

The importance of the connections between freshwater and marine systems need to be recognised because activities within catchments have implications downstream and across domains. The life cycle and ecosystem dependency of threatened seabirds, for example, crosses terrestrial, estuarine and marine domains.

11: Have we identified the right number of priority species?

- About right

12: Have we identified the right priority species?

13: Do you think other species should be prioritised ahead of the ones listed? And why?

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

The approach in the Strategy is primarily directed at terrestrial systems and species. The Strategy at present does not encompass the biodiversity of NZ as a whole – and it may be necessary to consider whether the development of a separate approach for the protection of marine species is warranted.

15: Do you have any further comments regarding the draft Strategy that is not covered above?

# DRAFT SUBMISSION ON THREATENED SPECIES STRATEGY

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We want to commend the department in the incredible concerted effort that it is to produce a National Threatened Species Strategy. We recognize that any system of prioritization by nature of the process will leave out species habitats etc. that are worth saving. We also recognize that the department has limitations in its ability to manage species in certain landscapes. We however think it is important that the department identify what is beyond the scope of this strategy. Conservation of Marine species for example is largely overlooked and if we are to halt their extinction then someone will need to step up to protect them. It is not fully clear in this document whether this is being put for the as New Zealand's strategy or the Department's strategy. It is important for the longevity and follow through of the strategy that this be our National Strategy and not just the Department's one.

## Purpose

The purpose of the strategy is commendable. We remark you mention it builds on existing programmes. We would like to know a bit more what the strategy means with regards to other programmes and plans that have been introduced over the last few years and where it might mean changes to these. For example New Zealand's Biodiversity Action Plan.

## Vision

It is great to have a focus to safeguard out vulnerable threatened species, we recognize this plan is ambitious and reflects DOC's commitment to saving our unique native wildlife. The vision recognized the role of managing threats, working in partnership and recognizing the indigenous kaitiaki, it however fails to mention the important role of ecosystems and how the landscape and ecosystem approach is integrated into a species prioritization strategy.

## Goals

The four strategic goals are commendable and ambitious.

Around 927 species of New Zealand's indigenous vascular plants are either threatened with extinction or risk becoming so. The DTSS aims to enhance 39 of these plant species under Goal 2 by 2025; five from the list of 50 'notable' species, and 34 selected from a list of 100 species using 'scientific' criteria. Enhancing the populations of these 39 plant species by 2025 would be a major achievement given DOC's the limited funding available for biodiversity

## Actions

**The Strategy would benefit from a full set of actions under each goal so that there is more clarity on how the department aims to achieve the ambitious goals.**

## Weaknesses

### How will the Strategy contribute to the conservation of rare and threatened ecosystems?

1. We'd like to know which ecosystem each of the priority species comes from because managing these species may contribute to the conservation of rare or threatened ecosystems. We recommend a weighting towards wetland and dune species in the list of 'notables' as these are New Zealand's most threatened ecosystems. DOC's SOI 2016-20 mentions a National Dune Management Plan.

## The right Tools for the Job

### Species Prioritization

50 species were picked for historic investment, public perception and political will, while we understand this reality we

2. Many New Zealanders may be unhappy when they realise that Kauri and the 2 species of Myrtaceae are not among the "notable" species Government wants to enhance under Goal 2. We hope these species are already on the list of un-named plant species to be managed under Goal 1 now. The consequences of waiting until after 2025 could be very serious.
3. We have more confidence in the methodology used to choose the other 100 species, and were pleased to find the Algorithm on the website. We suggest you add some Frequently Asked Questions (and answers) about the system in a TSS Appendix so material is readily available to help DOC staff and others explain it. One key question that needs an answer is why are there seven crosses, among the 34 priority plant species on the scientists' list of priorities (6 Lepidiums and 1 Pachycladon)?
4. Kauri and many Myrtaceae are of cultural significance to Maori. Under the DTSS Goal 3, iwi and Post Settlement Governance Entities are likely to expect a significant role in planning for the enhancement of these species. (See Teulon, DAJ and others (2015) "*The threat of myrtle rust to Maori taonga plant species in New Zealand*", New Zealand Plant Protection 68.).

### Actions

**A high level action plan with more than top 10 actions is needed as part of this strategic document**

**One of the actions here should be to develop species specific Action plans for all 150 species involving keys takeholders and taxa experts from the early stages of the action plan process**

5. Each species on the list will need an individualised prescription that take into account each species' biotic and abiotic requirements, its location and ecological setting, the local threats (current and future), the nature of the work to be done, and the mix of tools that are most

likely to be effective. Better information about the genetic variability within and between populations of each threatened species nationally and regionally has the potential to contribute to more efficient decision-making about priorities for collecting germ plasm for ex-situ initiatives. This work should be described in the final TSS.

6. Fenced sanctuaries and island reserves offering safe sites for populations of populations of plants raised by ex-situ conservation. Predator Free 2025 refers to removing predators from all island reserves. Why not remove herbivore, weeds and all introduced predators from more of these island reserves and mainland islands? A Spotlight about the successful propagation of the palatable Kirk's Daisy at Otari-Wilton's Bush, and its subsequent planting into Zealandia, a fenced sanctuary, would explain a lot about plant conservation.

### Research

7. We were pleased to learn that DOC has determined the conservation status of more non-vascular plants. It is disturbing, however, that there are still 1,165 data deficient species. When is DOC planning to increase its capability and capacity for managing non-vascular plants, e.g. overcoming the data deficiencies, and establishing baseline data for monitoring future changes in populations and distributions?

### The Tools

While we recognize that some of these tools are included as they are part of existing commitments and strategies. The tools section should recognize that a threatened species strategy which will tackle the engagement and management of specific species means the right tools for the conservation of each species need to be identified and implemented. While in many cases the tools will be the same (eg Predator control is likely to help reduce major threats to several species) jumping into the solution or tool without assessing specific threats and tactics would be a weak point for this strategy and muddy the approach.

#### Other threats

Why does New Zealand have so many threatened and at risk plants? The *Trouble in Paradise* section says nothing about the disruption of plants' reproductive processes as a result of fragmented populations, low fertility, in-breeding depression, gender-imbalances, low recruitment rates etc.

#### Recovery Planning

We hope that this strategy will help re-establish recovery groups for key taxa and species and allow mechanism to support communication between experts and conservation managers.

#### Ex situ conservation

8. The new partnership between DOC and the New Zealand members of BGANZ will enhance DOC's access to additional capabilities, particularly ex-situ techniques with the potential to contribute to the DTSS goals. Ex-situ conservation involves much more than storing seeds in seed-banking facilities. We have had the privilege of observing the work done by Otari-Wilton's Bush staff and external researchers in propagating threatened plants for replanting in the wild, e.g. *Brachyglottis kirkii* var *kirkii*, *Pimelia actea*, and *Olearia adenocarpa*.
9. The DTSS describes the benefits of the BGANZ partnership as "achieving more research, reducing costs, and increasing the efficiency and effectiveness of plant conservation work". (p21). It will do some of that within the current budget constraints of the seven member gardens and DOC, but it could do so much more. We hope DOC will support the partnership



- in at least three ways; with direct funding including staff time; by promoting plant conservation when talking to philanthropists and councils; and by advocating for increased investment in the DOC-BGANZ partnership by MPI and the National Science Challenges. These agencies both have responsibilities to enhance New Zealand's ability to respond when pathogens like kauri die-back and myrtle rust, and other new invaders cross the border
10. In brief, we want to see more 'smart thinking' about plant conservation in the final TSS, something that will excite and inspire New Zealanders. As it becomes more difficult for plant species to survive in the wild, we see ex-situ conservation making an increasingly important contribution to the long-term persistence of New Zealand's plant species.
  11. Captive management should be considered as part of a spectrum of conservation from intensive management (historically considered captive) to unmanaged wild populations, with fenced sanctuaries, and areas of pest control falling along the spectrum. While we applaud the inclusion of ex-situ tools as part of the toolset to fight our conservation challenges for threatened species, no mention was made of this spectrum for our endangered animals. We need to become smarter and implement One Plan Approach when looking at action plans for our threatened species. Intensive management, in ex situ situations has a role for the survival of many species and the right approach needs to be taken at the beginning planning stage to make sure we secure the best future for the species. For example breed for release is an integral part of the conservation strategy for Archey's frogs

#### *Herbivore control.*

12. The DTSS has no linkages to the herbivore programme in the New Zealand Biodiversity Action Plan 2016-2020 which says:  
*By 2020, browsing herbivores will be effectively controlled over a greater extent of forested ecosystems to minimise their impact on indigenous tree populations (DOC, partners).*
13. Herbivores also need to be controlled in non-forested ecosystems such as dunelands, sub-alpine scrub, wetlands etc. where some of the priority species live. DOC's Annual Report 2016 says that while possums and hares have invaded nearly all public conservation land, the areas they have invaded are almost mutually exclusive. Hares travel to much higher altitudes, threatening alpine and sub-alpine ecosystems. We'd like to know what DOC intends to do about herbivores.

#### *Climate Change.*

#### *Adaptive Management - Predator Free New Zealand*

14. We welcome the improvements that Predator Free New Zealand 2050 will make to the conservation of some birds, reptiles and invertebrates. Will DOC add monitoring of the recruitment rates for some palatable plant species among the PFNZ 2050 deliverables?
15. Removing these predators from our ecosystems may have unforeseen consequences. Hundreds of millions of exotic birds will likely survive as predators are controlled over the next 8 to 30 years. The potential impacts of these increases need to be identified and modelled. For example, expanding bird populations may eat higher proportions of the flowers, berries and seeds produced by some indigenous plant species, leaving fewer plants to "parent" in the next generation. Birds may also carry many millions of exotic seeds and fruits into natural and recovering ecosystems they may result in new or additional weed infestations and changes in ecosystem composition. We hope these will be monitored during

this endeavour and management plans be adaptive to accommodate or tackle raising challenges.

16.

### **Community Engagement**

17. New Zealand has done an extraordinary job raling its citizens in the “fight” against the introduced predators; it however lags behind when it comes to connecting its citizens to its endangered species. Many people have no idea that we even have native mammals (our wonderful bats) and others confuse a kakapo with a Kea. If any threatened species strategy is to be achieved it must engage its community. To do so people need to know and love our native species. A larger enfasis on this approach should be reflective in the strategy. We know that people only care about what they know and they know wht they have experienced so we need to work across organizations to increase experiences of nature and our threatened species to connect people and inspire them to act for wildlife

18.

Further to this, while many of the species in the list in particular those first 50 are charismatic and species with much political and public support. The strategy could benefit from highlighting a need to raise engagement in the conservation efforts of some of our less emblematic species. A programme focusing on raising awareness and engagement with our lesser known threatened scpecies both animal such as out native lizards, amphibians, mammals and invertebrates and our unique flora and fauna would be a great asset in implementing this strategy

### **What have we learned?**

19. Between 1993 and 2004,DOC developed recovery plans for nine plant species or groups of species (See Appendix 1). Four of these species are not on the list of 150; Shrubby tororaro (*Muehlenbeckia astonii*), *Leptinella nana*, *Pittosporum patulum* and *Hebe (Veronica) cupressoides*. What will happen in cases such as this with regards to any work currently undergoing on these species?

### **International Commitment Context**

20. Page 14 mentions several of New Zealand’s international reporting obligations for biodiversity. we note the Global Strategy for Plant Conservation (GSPC), should also be on p.14 because at least twelve of its 16 targets have implications for New Zealand’s Threatened Species Strategy, (see Appendix 2).

21. More of Aichi Biodiversity targets for the 2011-2020 period should be in the final DTSS, so New Zealanders understand how NZ’s reputation may suffer when officials submit the 6<sup>th</sup> (and final) National Report to the CBD in December 2020. For example:

- National Target 12: More Threatened, At Risk or Declining species are managed to the extent necessary to minimise extinction risk and ensure genetic biodiversity is maintained.
- National Target 6: Improved understanding of the impacts of climate change on biodiversity informs better management of vulnerable ecosystems and indigenous species.

### **Continuous improvement**

22. We also look forward to finding more detailed costings in the Briefing to the Incoming Minister of Conservation (2017) for delivering the four goals in the Threatened Species Strategy. We also hope to see up-to-date costings for implementing Government's more ambitious, whole of government Biodiversity Action Plan 2016-2020.
23. We recommends that the strategy should include room for a review based on the final report to the UN on the Biodiversity Action Plan in 2020. A review/rewrite would also provide an opportunity for the Government to outline its plans for managing the implications of climate change for threatened plants and animals.

### **We know you are only able to share some of the amazing conservation work in NZ in the spotlights. We would love to see some of thses stories highlighted in the final strategy or some of the future documents to come through the strategy**

24. Tourists to Otari-Wilton's Bush from cruise ships love hearing about the kākābeak initiative (Spotlight p.31). However, it's the only Spotlight in the DTSS to highlight progress towards the recovery of a threatened plant species. Can DOC report progress towards any others?

That question is not rhetorical. We suspect plant conservation has suffered from a lack of funding for many years. ECO LINK, (Jan-April 2017) reports that DOC has a shortfall of funding of over \$100 million annually for threatened species work and biodiversity protection.

# FISHERIES INSHORE NEW ZEALAND

Committed to Healthy Oceans Sustainable Fisheries

31 July 2017

██████████  
Department of Conservation  
PO Box 10 420  
Wellington 6143

██████████

## COMMENTS ON THE PROPOSED THREATENED SPECIES STRATEGY

1. On 9 May 2017, DOC released its draft Threatened Species Strategy for consultation and invited comments on the draft document. Fisheries Inshore New Zealand Limited (Fisheries Inshore) thank you for that opportunity.

### FISHERIES INSHORE NEW ZEALAND

2. Fisheries Inshore New Zealand Limited (FINZ) represents the inshore finfish, pelagic and tuna fisheries of New Zealand. It was formed in November 2012 as part of the restructuring of industry organisations. Its role is to deal with national issues on behalf of the sector and to work directly with and on behalf of its quota owners, fishers and affiliated Commercial Stakeholder Organisations (CSOs). As part of that work it also works collaboratively with other industry organisations and Sector Representative Entities (SREs), Seafood New Zealand, Ministry for Primary Industries (MPI) and the Department of Conservation (DOC).
3. Its key outputs are the development of, and agreement to, appropriate policy frameworks, processes and tools to assist the sector to more effectively manage inshore, pelagic and tuna fishstocks, to minimise their interactions with the associated ecosystems and work positively with other fishers and users of marine space where we carry out our harvesting activities.

### THE THREATENED SPECIES STRATEGY

4. The strategy sets out the Government's plan to halt the decline in our threatened species and restore them to healthy populations. The strategy establishes relevant goals and builds on five themes:
  - Uniting against invaders on a landscape scale;
  - Managing ecosystems at scale to protect species;
  - Building our science and knowledge base;
  - Focusing beyond public conservation land; and
  - Working together in partnerships.
5. The strategy has goals of increasing the species managed for protection, enhancing the population of 150 prioritised threatened and at risk species by 2015, integrating Mātauranga Māori into recovery plans and supporting research.
6. The strategy builds on the following platforms:

- Predator Free 2050;
- War on Weeds; Battle for our Birds;
- Save our Iconic Kiwi; Freshwater reforms; and
- National Science Challenge.

#### **QUALIFIED SUPPORT GIVEN**

7. We commend the Department on the preparation of the draft strategy and raising awareness of the plight of New Zealand's protected species. However, we find the Strategy short on detail and resourcing which undermines its potential to achieve what are laudable goals. This is essentially "business as usual" for the Department and does little to herald a new commitment to threatened species.
8. The strategy is effectively a re-packaging of existing programmes and activities. There is nothing new in what is being proposed in the strategy that will result in improved outcomes.
9. Of major concern to the seafood industry are:
  - the reduction in funding available to DOC for management of the Natural Heritage;
  - the continued worsening of the conservation status of protected species; and
  - the continuation of marine species faring poorly in DOC priorities.

#### Natural Heritage Funding Will Limit Future Performance

10. We note that the appropriation for Natural Heritage has been reduced from \$193m in 2016/17 to \$173m in 2017/18, a reduction of 12%, with no new initiatives approved and even existing initiatives, such as Battle for our Birds, having no future funding approved. The level of funding available to DOC for the management of threatened species is less in real terms than was available five years ago. The cut in funding comes at a time when DOC is heralding a new strategy. We have raised this matter before in relation to funding for the conservation of marine protected species.
11. By way of contrast, the total DOC appropriation has declined by only 4.7%, the recreational opportunities appropriation declining by only 1.7%. We are aware that DOC has other responsibilities but are concerned that its core Natural Heritage role is under-funded. We are also aware of the significant levels of DOC expenditure on back-office support functions such as management, administration and communications.
12. In May 2017, Government announced funding of \$2.8m over four years to assist the recovery of the sea lion population. Any additional funds were used exclusively by DOC to establish a ranger position with specific duties for mainland sea lion management. Ironically, the beneficiary of the funds will be DOC's other work since the funds are being used to create a position to consolidate work already financed by DOC and free the rangers previously providing services to sea lions to focus on other species.
13. We recommend that DOC re-assess its core priorities and align its spending with those priorities.
14. We note that DOC is seeking new collaborations for private funding to assist with the implementation of the strategy. While this taps into non-governmental sources of funding, it is nevertheless unfortunate that DOC is having to fund its general public interest activities by appealing for private donations. We are only too aware that such funding often comes with strings and conditions that may be unpalatable to other sectors of New Zealand society.
15. The seafood industry has long supported DOC through its funding of the Conservation Services Programme which focuses on marine protected species. While we have expressed reservations as to the legitimacy of the cost recovery of some of the activities, we have not opposed DOC using the appropriation for the conservation of marine protected species. However, we do have concerns that the majority of the expenditure is used to estimate populations or monitor interactions rather than

being spent on positive, constructive projects to assist the recovery of species. Monitoring decline is not a substitute for positive action to arrest it.

#### Continued Decline in Conservation Status

16. We have concerns about the continued poor or worsening conservation status of many species, particularly those identified as priorities.
17. We note that the conservation status of only 44 of the protected species, that had a conservation status of “at risk” or worse, improved their status during their review periods while another 92 declined in their status. Of those 44 that improved, only 19 had an actual improvement, the other 23 improved as a consequence of improved information or having existing data re-interpreted. Of the 92 whose status declined, 20 had an actual decline, the others declining on the basis of improved knowledge or a re-interpretation of existing data. Given that performance, it is difficult to accept that DOC currently has the resources or capability to improve the status of the threatened and at risk species.
18. We also have concerns as to how DOC intends to enhance populations of some species. The ability to enhance varies significantly with the biological nature of the species. Bird species have traditionally been the target of enhanced breeding programmes, for example, kiwi, kakapo and black robin, or translocation programmes. The costs of such programmes are significant and DOC does not appear to have the capacity or capability to increase the level of such intervention for additional species. Mammal species have been the target of DOC programmes to decrease the impact of threats, normally by use of spatial closures, e.g. Maui dolphins, but also by reducing the prospects of fatal interactions, for example, SLEDs – Sea Lion Exclusion Devices. However, broader action is necessary where spatial tools may not reduce the risk to an acceptable extent. The current risk to Maui dolphins from terrestrially-sourced *toxoplasmosis* is a case in point. Little else has been proposed.
19. The conservation status definitions are such that species are most unlikely to have their threat status improved other than by improved information. We note that too many of the existing classifications are subjective and take a historic focus rather than a current or forward looking focus. Reductions in threat levels are slow to be incorporated into the assessments. The thresholds between status groups is so large that species will be most unlikely to move to an improved status by natural growth. DOC may need to re-assess its conservation threat classifications if it wants to use that classification to record improvements.
20. Protected species are a part of the wider eco-system and their fortunes will wax and wane with the conditions of the ecosystem. It is pointless expecting that populations of protected species can continue to increase when the ecosystem about them is resulting in detrimental effects.
21. We would caution DOC against setting unrealistic expectations of its ability to enhance populations of all species, particularly where it has no capacity other than to rely on natural processes and changes in underlying eco-systems may not be conducive to improvements in threat status.

#### Marine Species Continue to Fare Poorly in DOC’s Priorities

22. While we commend DOC on the goal of enhancing the populations of the top 150 species, we are concerned that there will be a degree of selectivity in the choice of species selected for enhancement.
23. Marine species appear to have traditionally fared poorly in terms of DOC conservation effort relative to their terrestrial counterparts.
24. We have requested on a number of occasions a full statement of activities and research being undertaken by Crown agencies for marine protected species and have yet to be provided any information. Equally, we have requested but, with few exceptions, have not yet been provided with any strategic plans for the recovery of those marine protected species most at risk. Recovery plans seem to exist currently for only sea lions and Maui and Hector’s dolphins.

25. In the marine space, DOC has only been able to concentrate its efforts on a small number of species and has been largely ineffective in respect of the remaining species.
26. In the case of Maui and Hector's dolphins and New Zealand sea lions, DOC has been active in spatial closures and monitoring population numbers but there has been little proactive effort or research into the demographics and the means to assist the recovery of species. Research into disease and other threats has been minimal and often late, compared with an apparent excessive willingness to paint fishing as the primary threat and concentrate efforts and resources into fishing impacts.
27. In the recent Sea Lion TMP, notwithstanding *Klebsiella* being the most significant factor affecting the population of sea lions, DOC appears to have been unwilling to commit the bulk of discretionary research funding to that issue. Disease was known to be affecting the population of sea lions from 2002 onwards with *Klebsiella* being identified as the issue in 2007. But it was not until 2014 that *Klebsiella* entered DOC discussions of threats to sea lions and received funding and attention. Here in 2017, the research being undertaken is still basic work on the extent and the vectors of transmission, with no research commissioned as to possible remedies or field trials of possible remedies.
28. In the recently approved CSP programme, DOC seeks to commit significant funding to researching the diets of sea lions and seabirds, ascribing detrimental changes to fishing effects rather than a more balanced analysis of all environmental factors. That research is in the context of DOC previously acknowledging the impact of climate, weather and oceanic conditions on the availability of food and the impact on seabirds and sea lions.
29. Equally of concern is the lack of response to address threats, for example, the death of large numbers of sea lion pups in holes has been recognised for at least the past 20 years but was only addressed by the Plank for Pups programme at the Auckland Islands initiated in 2015 and an engineering study for Campbell Islands in 2017.
30. In the marine environment, the strategic approach of DOC looks to be to provide space and opportunity for marine species to achieve their own recovery – a low cost option. Active intervention, such as controlling terrestrial impacts, and focused expensive research seem not to be on the agenda for marine species.
31. We note that in the 50 Notable Species only the Antipodean albatross, Chatham Island magenta petrel (Taiko), New Zealand storm petrel, Yellow-eyed penguin make the list and the Chatham Island and Pitt Island shags make the next 100 species. We are somewhat surprised that Gibson's and Salvin's albatross and Black Petrels fail to make the list at all. In the marine mammal selections, we are surprised that Hector dolphins makes the selection ahead of killer whales which are assessed as Nationally Critical.
32. We note that the lists were compiled on the basis of their existing status, notwithstanding that the lists require updating and are no longer representative of the current risk status. Hector's dolphins and great white sharks are two species where updated risk assessments would have seen them differently rated. We cannot understand how the selection criteria and process could have provided the above outcomes.

#### The Top 10 Actions

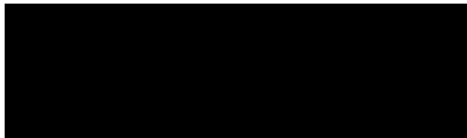
33. DOC has set out the Top 10 Actions it believes are needed to achieve the four threatened species goals of:
  - Manage 500 species for protection by 2025 and 600 by 2030.
  - Enhance the populations of 150 prioritised species by 2025;
  - Integrate Te Ao Maori and matauranga Maori into species recovery by 2015; and
  - Support research that helps us to better understand data deficient species.
34. The goals are not particularly challenging in that:

- DOC theoretically already manages all protected species and classifying more species as under management is a merely a labelling exercise;
- Enhance populations is very non-specific compared to, for example, improving the conservation status of the 150 priority species;
- Integration of Te Ao Maori and matauranga Maori is an ongoing engagement practice; and
- Supporting research is an ongoing role of DOC.

35. None of the Top 10 actions are material to obtaining the goals. The actions are commendable in their own right but are insufficient to address the plight of New Zealand's threatened species. We would prefer to see the Action Points containing activities that provide greater conservation value rather than administrative or managerial activities. For example, for each of the 150 threatened species identified for action, we would wish to see strategic plans developed that identify the threats, the options, the recovery objectives and recovery operational plans and research plans. DOC then needs to be able to provide a strategic prioritised plan of what it hopes to achieve. That plan must contain performance measures and action dates by which the performance of DOC can be assessed.

36. If DOC wishes to convince the New Zealand public that it can capably undertake the role assigned to it by Government, it needs to demonstrate that commitment in its prioritising of resources and targets and become more open and realistic in its targets. Asserting a re-packaging of existing initiatives constitutes a credible path to conservation success may not be sufficient.

Your sincerely



Fisheries Inshore New Zealand Limited



He tono nā



**Te Rūnanga o NGĀI TAHU**

ki te

**DEPARTMENT OF CONSERVATION**

e pā ana ki te

**DRAFT NEW ZEALAND'S THREATENED SPECIES STRATEGY**

31 JULY 2017

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## 1. EXECUTIVE SUMMARY

- 1.1 The Threatened Species Strategy (“TSS”) positively demonstrates the Department’s commitment and aspiration of achieving the TSS *Vision* to halt the decline and grow abundant populations of our indigenous species across Aotearoa.
- 1.2 However the TSS does represent an opportunity lost. The Draft Strategy does not clearly define its commitment to Goal 3 in a way that Te Rūnanga o Ngāi Tahu (“**Te Rūnanga**”) would have confidence that the expected outcomes for the Treaty partnership could be achieved through the TSS.
- 1.3 There is very little in the TSS that describes the detail required to achieve the commitment to Goal 3. The Department should add more detail to the TSS around this Goal in order to demonstrate value and support for the Treaty partnership.
- 1.4 Te Rūnanga has committed to a tribal wānanga in September to determine what is needed to achieve Goal 3. The outcomes from the tribal wananga will be credible and accurately represent Te Ao Ngāi Tahu and mātauranga Ngāi Tahu.
- 1.5 The Department will then have a fresh opportunity to support and implement these wānanga outcomes. The Department should work with Ngāi Tahu to determine how best to support this tribal commitment. Acting on the opportunity will ensure the TSS commitments to Ngāi Tahu are fulfilled in genuine partnership.

## 2. TE RŪNANGA O NGĀI TAHU

- 2.1. This response is made on behalf of Te Rūnanga o Ngāi Tahu (“**Te Rūnanga**”). Te Rūnanga is the statutory representative tribal body of Ngāi Tahu whānui and was established as a body corporate on 24th April 1996 under section 6 of Te Rūnanga o Ngāi Tahu Act 1996 (the Act).
- 2.2. We note for the Department the following relevant provisions of our constitutional documents:

Section 3 of the Act States:

*“This Act binds the Crown and every person (including any body politic or corporate) whose rights are affected by any provisions of this Act.”*

Section 15(1) of the Act states:

*“Te Rūnanga o Ngāi Tahu shall be recognised for all purposes as the representative of Ngāi Tahu Whānui.”*

- 2.3. The Charter of Te Rūnanga o Ngāi Tahu constitutes Te Rūnanga as the kaitiaki of the tribal interests.
- 2.4. Te Rūnanga respectfully requests that the Department accord this response the status and weight due to the tribal collective, Ngāi Tahu whānui, currently comprising over 55,000 members, registered in accordance with section 8 of the Act.
- 2.5. Notwithstanding its statutory status as the representative voice of Ngāi Tahu Whānui “for all purposes”, Te Rūnanga accepts and respects the right of individuals and Papatipu Rūnanga to make their own responses in relation to this matter.

### **3. TE RŪNANGA INTERESTS IN CONSERVATION LANDS, WATERS, TAONGA AND THREATENED SPECIES**

3.1 Te Rūnanga identifies the following matters of particular interest across conservation land, water and species managed by the Department of Conservation in the Ngāi Tahu takiwā:

#### ***Treaty Relationship***

- The Department of Conservation has a legal obligation to work in partnership with Ngāi Tahu. There is a general obligation under Te Tiriti o Waitangi. Section 4 of the Conservation Act 1987 (“**Section 4**”) establishes a specific obligation to give effect to the principles of Te Tiriti o Waitangi in all of the Department’s actions. The Ngāi Tahu Claims Settlement Act 1998 provides for the special relationship of Ngāi Tahu with taonga species.
- The Department must manage the environment and resources within the takiwā of Ngāi Tahu Whānui in a manner consistent with the legal framework that underpins the partnership. This includes conservation land, water and species, for which Ngāi Tahu Whānui have kaitiaki responsibilities and over which Ngāi Tahu Whānui hold rangatiratanga status.
- There is a reliance on a range of other mechanisms including the Ngāi Tahu Claims Settlement Act 1998, the Department’s Standard Operating Procedures (SOP’s) and guidance documents such as the Threatened Species Strategy.

#### ***The Ngāi Tahu Claims Settlement Act 1998 (“NTCSA”)***

3.2. With regards to the Ngāi Tahu takiwā, Section 5 of the Te Rūnanga o Ngāi Tahu Act 1996 statutorily defines the Ngāi Tahu takiwā as those areas “south of the northern most boundaries described in the decision of the Māori Appellate Court ...” which in effect is south of Te Parinui o Whiti on the East Coast and Kahurangi Point on the West Coast of the South Island. Section 2 of the Ngāi Tahu Claims Settlement Act 1998 statutorily defines the Ngāi Tahu claim area. (See the map attached as Appendix Two).

3.3. The Ngāi Tahu takiwā represents more than half of the total land area of Aotearoa. Over two thirds of all conservation land is within the Ngāi Tahu takiwā including over two thirds of all National Parks. The scale of the shared responsibilities across these ancestral lands predicates the need for an effective partnership to be in place.

3.4. Te Rūnanga has a specific interest by virtue of the Ngāi Tahu Claims Settlement Act 1998 (“**the NTCSA**”) which secures an enduring special relationship with taonga species. Those provisions include Ngāi Tahu representation in Species Recovery processes and on Species Recovery Groups representation. The NTCSA includes, among others, sections 293 and 294 of the NTCSA:

#### ***“s293 SPECIES MANAGEMENT OF ALL TAONGA SPECIES***

*The Crown having acknowledged the special association of Ngāi Tahu to the taonga species in section 288, the Minister of Conservation must, with respect to all taonga species, including those subject to recovery plans or species recovery groups,—*

*(a) advise Te Rūnanga o Ngāi Tahu in advance of any relevant conservation management strategy reviews or the preparation of any statutory or non-*

*statutory plans, policies, or documents (including any amendments or reviews) relating to a taonga species; and*

*(b) consult with, and have particular regard to the views of, Te Rūnanga o Ngāi Tahu when the Minister makes policy decisions concerning the protection, management, or conservation of a taonga species, including—*

*(i) recommendations to the Governor-General in Council for the promulgation of any regulations under any enactment; or*

*(ii) the preparation of any plans or publications for the advancement, conservation, management, or control of a taonga species pursuant to section 41(1)(e) of the Wildlife Act 1953; or*

*(iii) proposals for the transfer of a taonga species into or from the Ngāi Tahu claim area or methods of control or protection of a taonga species.”*

- 3.5 Conservation lands are Ngāi Tahu ancestral lands. The tribe still exists in these landscapes as they have done for many generations. Ngāi Tahu whānui continue to be shaped by these environments through their interactions and knowledge. Ngāi Tahu histories are throughout the motu and the very landforms are expressions of tribal identity.
- 3.6 As set out above, the traditional and statutorily recognised interests of Ngāi Tahu across a majority of Te Wai Pounamu are significant, which is why appropriate management of the natural environment and particularly toanga species in a partnership framework, is of such importance to Ngāi Tahu.

#### **4. THE DRAFT NEW ZEALAND’S THREATENED SPECIES STRATEGY (“TSS”) - KEY ISSUES**

- 4.1. Te Rūnanga o Ngāi Tahu wish to submit on the following key issues in relation to the TSS:

##### ***TSS Purpose:***

- 4.2 Te Rūnanga support the core objective stated in the first sentence of the *Purpose* of the TSS:

*“...the New Zealand Government’s plan to halt the decline in our threatened species and restore them to healthy populations.”*

##### **Recommendation:**

Te Rūnanga fully supports the initial statement of intent in the Purpose of the TSS.

##### ***TSS Vision:***

- 4.3 Te Rūnanga conditionally supports the overall vision of the TSS. Te Rūnanga has concerns about how the vision connects the proposed actions and outcomes from the strategy with the expected result of iwi then being able to fulfil their responsibility as kaitiaki. Te Rūnanga seeks clarification that the vision refers to iwi being able to exercise their responsibility as kaitiaki throughout the government’s effort to restore these species.
- 4.4 Te Rūnanga fully supports the statement in the vision that the TSS is underpinned by the partnership ethic between government and Māori/iwi. The TSS should be further strengthened with a clearer and more consistent representation of the Treaty partnership throughout the Strategy. In particular the Department’s continued

liberal application of the partner/partnership concept to other stakeholders, commercial investors and the general citizenry devalues the paramount partnership of iwi and hapū with the Crown.

**Recommendations:**

The Department clarifies the intent of the vision statement to ‘provide for our Treaty partners with an opportunity to fulfil that role’ in the context of iwi as kaitiaki.

The Department amends the TSS to include constructive opportunities for iwi and hapū to be involved in the on-going restoration work throughout the TSS.

The Department amends the vision to describe the ‘role’ of iwi as kaitiaki as a ‘responsibility’.

The Department redrafts the TSS to ensure a consistent use of the concept of partner to only relate to the Treaty partner.

**TSS Goal 3: Integrating the Treaty partnership**

- 4.6 Te Rūnanga is supportive of the inclusion of Goal 3 on page 5 that states the Department **will**:

*“Integrate Te Ao Māori (the Māori world view) and Mātauranga Māori (Māori knowledge) into species recovery programmes by 2025.”*

Goal 3 is positively aligned with the tribal expectation of engaging in a genuine Treaty partnership as envisioned by Section 4.

- 4.7 However Te Rūnanga is concerned that the TSS provides little strategic guidance on how Goal 3 should be achieved. The TSS does not contain any meaningful narrative or offer solutions to give effect to the commitment to Goal 3. The TSS should state the Department’s responsibilities as the Treaty partner to iwi and how that responsibility is given practical effect in the policy and management work for threatened species. These details are not present in the TSS.
- 4.8 The TSS is similarly silent on the Department’s existing Settlement obligations relating to species, also failing to recognise that a number of iwi are yet to settle with the Crown.
- 4.9 The Department should resource and support a process in a manner that meets the needs of Ngāi Tahu whānui to provide cultural advice about Te Ao Ngāi Tahu and mātauranga Ngāi Tahu as described in Goal 3. The Department should also commit to the development of an integration and monitoring framework to give effect to Goal 3. That combined level of commitment of time and resourcing would significantly reduce the 7 year timeframe to achieve Goal 3, which is unreasonably long.
- 4.10 The TSS demonstrates the Department does not currently have the capability to address the partnership aspect of their obligations to iwi and must now rely on iwi to fulfil that requirement.

**Recommendations:**

The Department must commit resources to assist Ngāi Tahu to develop tribal strategic priorities including determining details in relation to Goal 3 in the TSS, and;

Following the tribal wānanga the Department must work in partnership with Ngāi Tahu to develop a work programme to ensure the tribal outcomes relating to the TSS and specifically Goal 3 are implemented.

***Threatened Species Strategy General Comments:***

- 4.11 A reporting and monitoring framework should be developed for all aspects of the TSS to evaluate the performance of the Crown against the ambitious outcomes described in the TSS.
- 4.12 There are also a number of specific matters where the TSS will need input from Ngāi Tahu to be most effective. For example, the TSS states on page 19 that Mohua are highly vulnerable during their nesting season because they nest in holes in trees. What is also now known is that Mohua live in holes year round making them vulnerable at all times. This kind of information should be included in the TSS.

## APPENDIX ONE: TEXT OF CROWN APOLOGY

The following is text of the Crown apology contained in the Ngāi Tahu Claims Settlement Act 1998.

### ***Part One – Apology by the Crown to Ngāi Tahu***

#### ***Section 6 Text in English***

The text of the apology in English is as follows:

- 1 The Crown recognises the protracted labours of the Ngāi Tahu ancestors in pursuit of their claims for redress and compensation against the Crown for nearly 150 years, as alluded to in the Ngāi Tahu proverb ‘He mahi kai takata, he mahi kai hoaka’ (‘It is work that consumes people, as greenstone consumes sandstone’). The Ngāi Tahu understanding of the Crown’s responsibilities conveyed to Queen Victoria by Matiaha Tiramorehu in a petition in 1857, guided the Ngāi Tahu ancestors. Tiramorehu wrote:

*“This was the command thy love laid upon these Governors ... that the law be made one, that the commandments be made one, that the nation be made one, that the white skin be made just equal with the dark skin, and to lay down the love of thy graciousness to the Māori that they dwell happily ... and remember the power of thy name.”*

The Crown hereby acknowledges the work of the Ngāi Tahu ancestors and makes this apology to them and to their descendants.

- 2 The Crown acknowledges that it acted unconscionably and in repeated breach of the principles of the Treaty of Waitangi in its dealings with Ngāi Tahu in the purchases of Ngāi Tahu land. The Crown further acknowledges that in relation to the deeds of purchase it has failed in most material respects to honour its obligations to Ngāi Tahu as its Treaty partner, while it also failed to set aside adequate lands for Ngāi Tahu’s use, and to provide adequate economic and social resources for Ngāi Tahu.
- 3 The Crown acknowledges that, in breach of Article Two of the Treaty, it failed to preserve and protect Ngāi Tahu’s use and ownership of such of their land and valued possessions as they wished to retain.
- 4 The Crown recognises that it has failed to act towards Ngāi Tahu reasonably and with the utmost good faith in a manner consistent with the honour of the Crown. That failure is referred to in the Ngāi Tahu saying ‘Te Hapa o Niu Tirenī!’ (‘The unfulfilled promise of New Zealand’). The Crown further recognises that its failure always to act in good faith deprived Ngāi Tahu of the opportunity to develop and kept the tribe for several generations in a state of poverty, a state referred to in the proverb ‘Te mate o te iwi’ (‘The malaise of the tribe’).
- 5 The Crown recognises that Ngāi Tahu has been consistently loyal to the Crown, and that the tribe has honoured its obligations and responsibilities under the Treaty of Waitangi and duties as citizens of the nation, especially, but not exclusively, in their active service in all of the major conflicts up to the present time to which New Zealand has sent troops. The Crown pays tribute to Ngāi Tahu’s loyalty and to the contribution made by the tribe to the nation.



6. The Crown expresses its profound regret and apologises unreservedly to all members of Ngāi Tahu Whānui for the suffering and hardship caused to Ngāi Tahu, and for the harmful effects which resulted to the welfare, economy and development of Ngāi Tahu as a tribe. The Crown acknowledges that such suffering, hardship and harmful effects resulted from its failures to honour its obligations to Ngāi Tahu under the deeds of purchase whereby it acquired Ngāi Tahu lands, to set aside adequate lands for the tribe's use, to allow reasonable access to traditional sources of food, to protect Ngāi Tahu's rights to pounamu and such other valued possessions as the tribe wished to retain, or to remedy effectually Ngāi Tahu's grievances.
7. The Crown apologises to Ngāi Tahu for its past failures to acknowledge Ngāi Tahu rangatiratanga and mana over the South Island lands within its boundaries, and, in fulfilment of its Treaty obligations, the Crown recognises Ngāi Tahu as the tangata whenua of, and as holding rangatiratanga within, the Takiwā of Ngāi Tahu Whānui.

Accordingly, the Crown seeks on behalf of all New Zealanders to atone for these acknowledged injustices, so far as that is now possible, and, with the historical grievances finally settled as to matters set out in the Deed of Settlement signed on 21 November 1997, to begin the process of healing and to enter a new age of co-operation with Ngāi Tahu.”

APPENDIX TWO: NGĀI TAHU TAKIWĀ



## APPENDIX THREE: RELEVANT PROVISIONS FROM THE NGĀI TAHU CLAIMS SETTLEMENT ACT 1998

The following sections and schedules are extracts from the Ngāi Tahu Claims Settlement Act 1998 as they relate to taonga and threatened species.

### s287 Interpretation

In [sections 288 to 296](#),—

**recovery plan** means a written statement by the Department of Conservation of its intentions for the conservation of threatened species or endangered species over a defined period, that is intended to provide guidance to the Department of Conservation on the allocation of resources and promote discussion with the public, and includes any plan issued by the Minister of Conservation pursuant to [section 41\(1\)\(e\)](#) of the Wildlife Act 1953

**species recovery group** means a group of persons appointed for the purpose of making recommendations to the Department of Conservation in relation to a threatened or endangered species including persons with expertise relating to that threatened species from within the Department of Conservation and elsewhere, as well as persons who may be otherwise affected by such recommendations

**taonga species** means the species of birds, plants, and animals described in [Schedule 97](#) found within the Ngāi Tahu claim area

**threatened species** and **endangered species** means species of plants, birds, and animals which from time to time are assessed by the Department of Conservation to have a high risk of extinction in the short to medium term, unless management intervention occurs, assessed on the basis of the criteria set out in *Molloy and Davis—Setting Priorities for the Conservation of New Zealand’s Threatened Plants and Animals, Second Edition, October 1994, Department of Conservation*, as those criteria may be revised from time to time.

### s288 Special association with taonga species acknowledged

The Crown acknowledges the cultural, spiritual, historic, and traditional association of Ngāi Tahu with the taonga species.

### s289 Purpose of acknowledgement

Without limiting [sections 290 to 292](#), the acknowledgement in [section 288](#) is for the purposes of [sections 293](#) and [294](#) only.

### s290 Exercise of powers, duties, and functions

Except as expressly provided in [sections 288 to 296](#),—

(a) the acknowledgement made in [section 288](#) does not affect, and may not be taken into account in the exercise of, any power, duty, or function of any person or entity under any statute, regulation, or bylaw; and

(b) without limiting paragraph (a), no person or entity, in considering any matter or making any decision or recommendation under any statute, regulation, or bylaw, may give any greater or lesser weight to Ngāi Tahu's association to the taonga species than that person or entity would give under the relevant statute, regulation, or bylaw if no acknowledgement had been made by the Crown of that association to the taonga species.

#### **s291 Rights not affected**

Except as expressly provided in [sections 288 to 296](#), the acknowledgement made in section 288 does not affect the lawful rights or interests of any person who is not a party to the deed of settlement.

#### **s292 Limitation of rights**

Except as expressly provided in [sections 288 to 296](#), the acknowledgement made in section 288 does not, of itself, have the effect of granting, creating, or providing evidence of any estate or interest in, or any rights of any kind whatsoever relating to, any taonga species.

#### **s293 Species management of all taonga species**

The Crown having acknowledged the special association of Ngāi Tahu to the taonga species in [section 288](#), the Minister of Conservation must, with respect to all taonga species, including those subject to recovery plans or species recovery groups,—

(a) advise Te Rūnanga o Ngāi Tahu in advance of any relevant conservation management strategy reviews or the preparation of any statutory or non-statutory plans, policies, or documents (including any amendments or reviews) relating to a taonga species; and

(b) consult with, and have particular regard to the views of, Te Rūnanga o Ngāi Tahu when the Minister makes policy decisions concerning the protection, management, or conservation of a taonga species, including—

(i) recommendations to the Governor-General in Council for the promulgation of any regulations under any enactment; or

(ii) the preparation of any plans or publications for the advancement, conservation, management, or control of a taonga species pursuant to [section 41\(1\)\(e\)](#) of the Wildlife Act 1953; or

(iii) proposals for the transfer of a taonga species into or from the Ngāi Tahu claim area or methods of control or protection of a taonga species.

#### **s294 Species recovery groups**

The Crown having acknowledged the special association of Ngāi Tahu with the taonga species in [section 288](#), the Director-General must, to the extent that a taonga species is or becomes the subject of a recovery plan or species recovery group,—

(a) provide Te Rūnanga o Ngāi Tahu with copies of the proceedings and publications of any relevant species recovery group for that taonga species; and

(b) consult with, and have particular regard to the views of, Te Rūnanga o Ngāi Tahu when the Director-General makes policy decisions concerning the protection, management, or conservation of all taonga species subject to a species recovery group, including—

(i) recommendations to the Minister of Conservation in respect of the promulgation of any regulations under any enactment; or

(ii) the preparation of any plans or publications for the advancement, conservation, management, or control of a taonga species pursuant to [section 41\(1\)\(e\)](#) of the Wildlife Act 1953; or

(iii) proposals for the transfer of a taonga species into or from the Ngāi Tahu claim area or methods of control or protection of a taonga species; and

(c) invite Te Rūnanga o Ngāi Tahu to nominate a person to join any relevant species recovery group for a taonga species which exists or existed solely or predominantly within the Ngāi Tahu claim area; and

(d) in the case of kākāpō, hoiho (yellow-eyed penguin), kakī (black stilt), mohua (yellowhead), takahē, tīeke (South Island saddleback), and rāpoka/whakahao (New Zealand sea lion), invite Te Rūnanga o Ngāi Tahu to nominate a person to join the species recovery groups for those taonga species.

#### **s295 Notice of establishment of species recovery groups**

The Director-General must give Te Rūnanga o Ngāi Tahu reasonable advance notice of the establishment of a species recovery group in respect of a taonga species.

#### **s296 Possession of specimens of wildlife**

(1) In this section,— **sale** has the same meaning as in the [Wildlife Act 1953](#)

**specimens** means the dead bodies or any part of the dead bodies of any species of wildlife absolutely protected pursuant to [section 3](#) of the Wildlife Act 1953 or partially protected pursuant to [section 5](#) of that Act.

(2) Notwithstanding anything to the contrary contained or implied in the [Wildlife Act 1953](#) or the [Wildlife Regulations 1955](#), members of Ngāi Tahu Whānui may lawfully have specimens in their possession.

(3) Possession of specimens may be transferred between members of Ngāi Tahu Whānui by way of gift, bequest, or other non-commercial transfer but specimens may not be transferred by way of sale, whether to other members of Ngāi Tahu Whānui or to any other person or entity.

(4) This section does not permit or authorise the hunting or killing of wildlife other than in accordance with the [Wildlife Act 1953](#).

**The following taonga species list can be found in Schedule 97 of the Ngāi Tahu Claims Settlement Act 1998**

**Birds**

Māori name English name Scientific name

hoiho yellow-eyed penguin *Megadyptes antipodes*

kāhu Australasian harrier hawk *Circus approximans*

kāka South Island kaka / forest parrot *Nestor meridionalis*

*meridionalis*

kākāpō kakapo *Strigops habroptilus*

kākāriki New Zealand parakeet *Cyanoramphus* spp.

kakaruai South Island robin *Petroica australis australis*

kakī black stilt *Himantopus novaezelandiae*

kāmana Australasian crested grebe *Podiceps cristatus*

kārearea New Zealand falcon *Falco novaeseelandiae*

karoro black backed gull *Larus dominicanus*

kea kea/mountain parrot *Nestor notabilis*

kōau black, pied and little shag *Phalacrocorax carbo*, *P. varius varius*, *P. melanoleucos brevirostris*

koekoeā long-tailed cuckoo *Eudynamys taitensis*

kōparapara or korimako bellbird *Anthornis melanura melanura*

kororā blue penguin *Eudyptula minor*

kōtare kingfisher *Halcyon sancta*

kōtuku white heron *Egretta alba*

kowhiowhio blue duck *Hymenolaimus malacorhynchos*

kuaka bar-tailed godwit *Limosa lapponica*

kūkupa/kererū New Zealand pigeon *Hemiphaga novaeseelandiae*

kuruwhengu/kuruwhengi NZ shoveler *Anas rhynchos*

mata fernbird *Bowdleria punctata punctata*, *B.p. stewartiana*, *B.p. wilsoni* & *B.p. candata*

matuku Australasian bittern *Botaurus poiciloptilus*

matuku moana blue reef heron *Egretta sacra*

miromiro tomtit (South Island and Snares Island) *Petroica macrocephala macrocephala* & *P.m. dannefaerdi*

mohua yellowhead/bush canary *Mohoua ochrocephala*

ngutu pare/parore wrybill plover *Anarhynchus frontalis*

pākura/pūkeko swamp hen/pukeko *Porphyrio porphyrio*

pārera grey duck *Anas superciliosa*

pāteke brown teal *Anas aucklandica*

pihoihoi ground lark/New Zealand pipit *Anthus novaeseelandiae*

pīpīpi brown creeper *Finschia novaeseelandiae*

pīpīwharauoa shining cuckoo *Chrysococcyx lucidus*

pīwakawaka South Island fantail *Rhipidura fuliginosa fuliginosa*

pīwauwau rock wren *Xenicus gilviventris*

poaka pied stilt *Himantopus himantopus*

pokotiwaha Snares crested penguin *Eudyptes robustus*

pūtakitaki Paradise shelduck *Tadorna variegata*

riroriro grey warbler *Gerygone igata*

roroa great spotted kiwi *Apteryx haastii*

rowi Okarito brown kiwi *Apteryx mantelli*

ruru koukou morepork *Ninox novaeseelandiae*

takahe takahe *Porphyrio mantelli*

tara tern *Sterna* spp.

tarapirohe black-fronted tern *Sterna albobriata*

tarāpunga black-billed gull *Larus bulleri*

tawaki Fiordland crested penguin *Eudyptes pachyrhynchus*

tete grey teal *Anas gracilis*

tīeke South Island saddleback *Philesturnus carunculatus carunculatus*

tītī muttonbird/sooty shearwater, *Puffinus griseus*, *P.huttoni*

Hutton's shearwater

tītī common diving, *Pelecanoides urinatrix*, *P. georgicus* &

South Georgian & Westland petrel *Procellaria westlandica*

tītī fairy prion & broad-billed prion *Pachyptila turtur* & *P. vittata*

tītī White-faced storm petrel, *Pelagodroma marina*, *Pterodroma*

Cook's & mottled petrel *cookie* & *P. inexpectata*

tītiti-pounamu South Island rifleman *Acanthisitta chloris chloris*

tokoeke South Island brown kiwi *Apteryx australis*

tōrea pied oystercatcher *Haematopus ostralegus*

toroa albatrosses and mollymawks *Diomedea spp.*

toutouwai Stewart Island robin *Petroica australis rakiura*

tūi tui/parson bird *Prothemadera novaeseelandiae*

tutukiwi Snares Island snipe *Coenocorypha aucklandica huegeli*

turiwhatu banded dotterel *Charadrius bicinctus*

weka Western, Stewart Island & Buff weka *Gallirallus australis australis*, *G.a. scotti* & *G.a. hectori*

### **Marine mammals**

ihupuku Southern elephant seal *Mirounga leonina*

kekeno New Zealand fur seal *Arctocephalus forsteri*

paikea humpback whale *Megaptera novaeangliae*

parāoa sperm whale *Physeter macrocephalus*

rāpoka/whakahoā Hookers sea lion *Phocarctos hookeri*

tohorā Southern right whale *Balaena australis*

upokohue Hector's dolphin *Cephalorhynchus hectori*

### **Plants**

Māori name English name Scientific name

akatorotoro white rata *Metrosideros perforata*

aruhe bracken/fernroot *Pteridium aquilinum varesculentum*



harakeke flax *Phormium tenax*

houhi mountain ribbonwood *Hoheria lyalli* and *H. glabata*

kaikahikatea kahikatea/white pine *Dacrycarpus dacrydioides*

kamahi kamahi *Weinmannia racemosa*

kānuka kanuka *Kunzia ericoides*

kāpuka broadleaf *Griselinia littoralis*

Karaeopirita supplejack *Ripogonum scandens*

karaka New Zealand laurel *Corynocarpus laevigata*

karamū *Coprosma* spp. *Coprosma robusta*, *C. lucida*, *C. foetidissima*

kātote tree fern *Cyathea smithii*

kiekie kiekie *Freycinetia baueriana* subsp *banksii*

kōhia New Zealand passionfruit *Passiflora tetrandra*

korokio wire/netting bush *Corokia buddleoides*

koromiko/koromuka hebe *Hebe salicifolia*

kōtukutuku native tree fuchsia *Fuchsia excorticata*

kōwhai/kōhai kowhai *Sophora microphylla*

mamaku tree fern *Cyathea medullaris*

mānia sedge *Carex lucida*

mānuka/kahikātoa tea-tree *Leptospermum scoparium*

māpou red matipo *Myrsine australis*

mataī matai/black pine *Prumnopitys taxifolia*

miro miro/brown pine *Podocarpus ferrugineus*

nīkau New Zealand palm *Rhopalostylis sapida*

Ngaio fern *Myoporum laetum*

Panako fern *Asplenium obtusatum*, *Botrychium australe*

pātōtara dwarf mingimingi *Leucopogon fraseri*

pīngao golden sand sedge *Desmoschoenus spiralis*

pokākā pokaka *Elaeocarpus hookerianus*  
ponga/poka tree fern *Cyathea dealbata*  
rātā Southern rata *Metrosideros umbellata*  
raupō bulrush *Typha angustifolia*  
rautawhiri/kōhūtū black matipo/mapou *Pittosporum tenuifolium*  
rimu rimu/red pine *Dacrydium cypressinum*  
rimurapa bull kelp *Durvillaea antarctica*  
taramea speargrass/spaniard *Aciphylla* spp.  
tarata lemonwood *Pittosporum eugenioides*  
tawhai beech *Nothofagus* spp.  
tete-a-weka muttonbird scrub *Olearia angustifolia*  
tikumu mountain daisy *Celmisia spectabilis* and *C. semicordata*  
ti rākau/ti kōuka cabbage tree *Cordyline australis*  
titoki New Zealand ash *Alectryon excelsus*  
toatoa mountain toatoa/celery pine *Phyllocladus alpinus*  
toetoe toetoe *Cortaderia richardii*  
tōtara totara *Podocarpus totara*  
tutu tutu *Coriaria* spp.  
wharariki mountain flax *Phormium cookianum*  
whinau hinau *Elaeocarpus dentatus*  
wī silver tussock *Poa cita*  
wīwī rushes *Juncus* all native spp. & *J. maritimus*

# New Zealand's Threatened Species Strategy: submissions for consultation

#131

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter or contact person:	[REDACTED]
Organisation name: <i>(if on behalf of an organisation)</i>	Federated Mountain Clubs of NZ
Email:	[REDACTED]
Signature: <i>(we accept a typed signature if no electronic signature)</i>	[REDACTED]



**Submission:**

**You can answer all or some of the questions.**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

FMC is a strong supporter of the Predator Free New Zealand 2050 (and 2025) goals. This is an example of a vision that may, arguably has, captured the hearts and mind of New Zealanders.

In comparison, the current 'vision' in the Threatened Species Strategy is lacking ambition.

FMC, would suggest a phrase first put forward by Kennedy Warne, "A Fair Go for Nature", as an idea that Kiwis might come in behind.

FMC would then also - consistently with our belief that the Department of Conservation's biodiversity funding should substantially increased - advocate for a doubling of each of the goals:

- Manage 1000 species for protection by 2025
- Enhance the populations of 300 prioritised threatened and at risk species by 202.

FMC applauds the integration of Te Ao Maori and matauranga Maori into species recovery programmes by 2025 and also the prioritisation of resources for investigating data deficient species. FMC would encourage the ramping up of support for citizen science organisations, to help achieve these aims.

2: Are there additional aspects that you think should be included in the vision?

There is a risk when focusing on species protection, that considerations of habitat, or range will be lost. There continues to be development pressures on many of our rarest ecosystems, particularly in and around our wetlands, rivers and oceans.

There should be a commitment in the Vision statement that the habitat of all threatened species will be protected, wherever such habitat exists.

3: Do you agree with the characterisation of the value and current state of our native species?

Yes

4: Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?

Yes, though FMC would emphasise that captive management, translocations and fenced sanctuaries are the last resorts of best practice conservation management. In Situ conservation that protects the unique ecological relationships between species (the web of life) in a given place must be the preferred option, as we often simply don't know what we lose when these relationships are broken.

5: Are there other tools we could use to help us achieve the vision?

Nature needs a champion. DOC has a statutory mandate to advocate on behalf of indigenous biodiversity beyond the borders of public conservation land. DOC's ability to do so, at least in the public sphere, has been constrained, one must assume by Ministerial instruction.

Recent examples include high profile issues such as: the Ruataniwha Dam and the Te Kuha coalmine.

FMC calls for DOC to be given a clear mandate and resourcing to advocate on behalf of indigenous biodiversity where-ever it occurs.

6: Will the proposed goals help us achieve the vision and assess our progress?

The proposed goals are the vision, this perhaps shows the weakness of the vision... The construction of the goals around numbers of threatened species either protected or increasing is appropriate for assessing progress.

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

Consistent with our comments regards the vision, FMC believes that there should be a fifth goal: Ensure that the habitat of all threatened species is protected from human threat or modification by 2025.

8: Have we identified the right strategic themes?

Yes, except please add a theme regarding the need to protect all habitat of all threatened species from human threat or modification. The project to create a National Policy Statement on Indigenous Biodiversity will hopefully be a good step towards this, but further regulation may be necessary.

9: Do you agree with our top 10 actions?

Yes. They are well thought out actions.

10: Are there any other actions that should be included, and any actions that should be removed?

Add an action regarding the protection of habitat of all threatened species from human threat or modification. The action may include purchasing or covenanting habitats.

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right • **Too few**

**Comments: This strategy should be appropriately resourced to recognise the significance to New Zealanders of our native bioversity.**

12: Have we identified the right priority species?

Yes

13: Do you think other species should be prioritised ahead of the ones listed? And why?

No

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

FMC believes the strategy, will when adapted to provide recognition to public feedback, given more ambitious goals and put in the context of substantially increased funding for conservation, serve a useful purpose.

15: Do you have any further comments regarding the draft Strategy that is not covered above?

The writers of the strategy should be applauded for their eloquence and clear use of language.

[Redacted]

**From:** [Redacted]  
**Sent:** Monday, 31 July 2017 3:27 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Name:** [Redacted]  
**Organisation:** Brook Valley Community Group Incorporated  
**Email:** [Redacted]

- q1:
- q2:
- q3:
- q4:
- q5:
- q6:
- q7:
- q8:
- q9:
- q10:
- q11:
- q11comments:
- q12:
- q13:
- q14:

q15: Yes I do. The timeframe for submissions is absurd. Our Community Group is currently engaged in a High Court action against the Crown amongst other parties. Despite a considerable interest being expressed by numerous parties around the country, not one referred to the existence of this draft Strategy. The inevitable inference they, and we, draw, is that it has been deliberately intended that a sham be presented as sufficient notification and opportunity. Given the nature of our submissions about the decisions made by the Crown in recent times, this is a compelling conclusion to be drawn. You should be aware, if you are not, that the Department of Conservation is gaining a thoroughly bad reputation in the community at large, particularly on the matter of aerial poisoning.

# New Zealand's Threatened Species Strategy: submissions for consultation

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Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter or contact person:	██████████ Manager – Wellington Gardens
Organisation name: <i>(if on behalf of an organisation)</i>	Wellington Gardens (Wellington Botanic Garden and Otari-Wilton's Bush and Native Botanic Garden)
Email:	████████████████████
Signature: <i>(we accept a typed signature if no electronic signature)</i>	



## Submission:

### You can answer all or some of the questions.

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

DoC is to be commended in its decision to take this positive step towards the conservation of New Zealand's threatened species and its vision towards achieving that. The underlying question is does it, or can it go far enough?

In setting a 'snapshot' target it sets a prescription for action. However much of this is targeted on well understood and well documented species where there is already substantial progress towards persistence and/or enhancement and species stability. The alienation of a significant number of threatened plant species as a subtext to the vision is of concern.

There are a multitude of plans and programmes and strategies for ecosystem management, species management, pest plant and predator management and control. The hierarchy and inter-relationships of these need to be clear as does their relationship to the New Zealand Biodiversity (Strategy) Action Plan 2016 - 2020.

2: Are there additional aspects that you think should be included in the vision?

The vision identifies that it is 'everyone's responsibility and role' to play a part in the conservation of our native species. It means that conservation efforts are focussed, resources optimised and that they are joined up. This requires DoC to reach out beyond its own estate towards a better national understanding of what is being achieved, where the gaps are and its role as a facilitator to address those gaps.

3: Do you agree with the characterisation of the value and current state of our native species?

Within the narrow framework of the strategy plants are under-represented. Characterisation of the value and current state of threatened species is captured by the New Zealand Threat Classification system but there remain significant gaps in knowledge of ecosystems, species and populations which need to be addressed before 'jumping' to conservation responses.

Of the top 50 species two plants are widespread in cultivation and the third, *Ranunculus paucifolius* is unlikely to be found anywhere other than Castle Hill. This is not to diminish the value of *R. paucifolius* – a population which can be maintained and enhanced – but to suggest that there are much more important populations and ecosystems to be putting substantial resources into - braided river systems, coastal margins and wetlands as examples.

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

Otari Native Botanic Garden is active in its support for the New Zealand Indigenous Flora Seedbank both through capacity building and seed collection. Ex situ conservation of germplasm, not noted in the draft document, has a number of streams including seed banking, translocation, assisted migration, tissue culture, field gene banks, cryopreservation and insurance populations. While the tools and often the resources are already available there needs to be better coordination of priorities for the application of these to achieve the best possible outcomes in the circumstances available to us. This will continue to be a challenge with insurance populations being regarded as being greater than 100 living plants representative of the genetic diversity of a population. Managing such populations will require inventiveness and cooperation across a range of willing stakeholders.

5: Are there other tools we could use to help us achieve the vision?

The ratification of proposed National Strategy for Ex Situ Plant Conservation should be recognized. The harnessing of Botanic Gardens resources will be a powerful tool in the conservation of threatened plant species.

6: Will the proposed goals help us achieve the vision and assess our progress?

In principle, yes. It will be important to quantify baselines against which to measure progress and internationally recognised models against which to benchmark success.

The focus for preservation should in the first instance be on persistence. Enhancement will naturally follow on from successful persistence assuming there is potential for enhancement. Enhancement encourages attention to a few hero species, almost never a plant, at the expense of less ‘attractive’ species and often in isolation of their ecological context(s).

We applaud the ongoing commitment to Te Ao Maori and the understanding of the relationships of plants and people. The value of the opportunities to work with more closely with iwi in conservation of plants cannot be understated.

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

The goals in a national and international context are already in place. In particular these are prescribed in the Convention for Biological Diversity’s Aichi Biodiversity Targets and in turn the Global Strategy for Plant Conservation. Botanic gardens are working towards these as their resources and capability allow. Otari Native Botanic

Garden already works regionally with DoC, Greater Wellington, Horizons Regional Council and is active in seed collection from throughout the country. A stronger emphasis in the goals needs to be on raising the profile of threatened plants, the paths to partnerships and alignments to encourage positive conservation outcomes.

8: Have we identified the right strategic themes?

Predator free 2050 is a powerful theme and tool towards achieving the goals. However it is not the universal panacea. Herbivorous grazing and people present the greatest threats to species and in turn to ecosystems. A strong communications component should be an integral theme of the strategy to reinforce that it is everyone's role and responsibility; that everyone can make a difference

9: Do you agree with our top 10 actions?

The strategy goals do not adequately recognise the importance of community and communication in achieving the targets. Ultimately it is the thousands of people on the ground who will make major contributions both collectively and individually to the success of the strategy.

Much of Otari's success is due to its strong community of interest. The need for coordinated and congruent partnerships at every level of engagement will be critical to the success of the strategy. This is a fundamental top 10 Action.

We are not sure of the ongoing priorities for proposed data deficient research of the 500 species. The Draft Threatened Species Strategy proposed protection list, despite the science, ultimately appears to have been a pragmatic one. We would want to be sure that there are genuine priorities identified for research and that these should extend to more vascular and non-vascular plant species than at present.

Otari is already active in capacity building to support plant conservation. Botanic gardens nationwide hold significant resources to contribute towards building community capacity.

10: Are there any other actions that should be included, and any actions that should be removed?

Other than the broad brushes of the Conservation Act 1987 and Reserves Act 1977, there is no specific legal protection for plants to an equivalent of that which exists for birds and marine animals. This continues to bring into question just how much do we value our endemic flora. Enhancing legislative protection for plants as identified on P25 would be a positive measure under Action 5.

11: Have we identified the right number of priority species?  
(Circle or highlight one) • Too many • About right • **Too few**

**Comments:**

We appreciate that this list is a start and the difficulty in narrowing down the estimated 1155 plant species which are data deficient, threatened or at risk t could potentially qualifying for the list. We would like to be sure that the rigors of sound scientific criteria are applied to the selection of priority species rather than their recognition as iconic or notable species.

12: Have we identified the right priority species?

With respect to plants we would have to answer that in a large part the criteria for priority are open to question. *Pennatia baylisiana* and *Tecomanthe speciosa* are unlikely to ever be more than their one plant in the wild yet both are extensively cultivated and won't be lost from our flora. Likewise for the *Clianthus* species though some work in preserving the genetic diversity may still need to be undertaken.

13: Do you think other species should be prioritised ahead of the ones listed? And why?

The absence of ferns and fungi is of concern. While these may not necessarily have a higher priority they do have an equal priority particularly fungi which play such an important but yet to be fully understood role in our ecosystems. There is also inequality in the treatment of invertebrates.

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

We believe these are a positive start however in finalising the strategy we would like to see a greater emphasis on research, on vascular and non-vascular plants and on invertebrates. We would like to see a greater ecosystem emphasis as threats to species are often as a result of the modification of ecosystems. Ecosystems cannot be replicated off site and should be the first priority.

15: Do you have any further comments regarding the draft Strategy that is not covered above?

We understand that this strategy does not and should not set out to address issues raised by the impacts of climate change. However it appears to ignore climate change particularly with reference to coastal and alpine taxa. Unless they can be brought into ex situ conservation programmes they are highly likely to be lost to the wild within the foreseeable future. Botanic gardens will be key players in this.

The Botanic Gardens through BGANZ –NZ Region continue to work through the development of the Ex Situ Conservation Strategy for plants. We reinforce the importance of partnerships and trusted relationships which are and will be increasingly critical to the conservation of plants, maintenance and restoration of degraded ecosystems and the raising of public awareness of plants to all life.



27 July 2017

Threatened Species Strategy  
Department of Conservation  
PO Box 10420  
Wellington 6143

## **SUBMISSION ON THE DRAFT THREATENED SPECIES STRATEGY**

1. The Dunedin City Council is pleased to submit in support of the draft Threatened Species Strategy. The Dunedin City Council is responsible for meeting the current and future needs of communities for good quality local infrastructure, local public service and performance of regulatory functions in a way that is most cost effective for households and businesses, under the Local Government Act 2002.
2. In 2016, the Dunedin City Council adopted **Te Ao Tūroa – The Natural World, Dunedin’s Environment Strategy 2016-2026**. The Strategy takes a partnership approach to **delivering on the city’s environment ambitions, with everyone working together to facilitate and secure a healthy environment now and into future**. The **Strategy’s** aspirational goals are:
  - Dunedin is resilient and carbon zero – developing and implementing a climate change adaptation plan and sustainable resource management;
  - Dunedin has a healthy environment – taking a landscape-scale approach to protecting ecosystems and increasing indigenous biodiversity; and,
  - Dunedin people care for the natural world – engaging with the community and **raising awareness of issues around the city’s natural environment**.
3. **The Strategy’s implementation is overseen, monitored and reviewed by the Te Ao Tūroa Partnership**, the governance group for the Strategy that includes a range of key city stakeholders and community representatives.
4. The Dunedin City Council is active in safeguarding the natural world, and this is an increasing focus since the adoption of **Te Ao Tūroa**. This work includes:
  - providing financial and in-kind support to Predator Free Dunedin aimed at landscape-scale predator removal for development of a Dunedin Predator Management Plan;
  - approving the recently reviewed Reserves and Beaches Bylaw 2017 which considered human impacts on wildlife; and,
  - developing the draft Destination Plan with one of the aims to manage impacts of increased numbers of visitors to protect and enhance our natural environment.
5. **The Otago Peninsula’s wildlife** – including the New Zealand Sea Lion, Yellow-eyed Penguin and Northern royal albatross – **has led to Dunedin being dubbed the ‘Wildlife Capital’ of New Zealand**. Enterprises directly involved in wildlife viewing on the Peninsula

have a gross annual turnover of around \$6.5 million and employ the equivalent of 70 full-time staff<sup>1</sup>.

6. In the context of the Dunedin City Council's responsibilities and functions, there is a role in contributing to implementation of the draft Threatened Species Strategy.
7. The Dunedin City Council has a role and responsibility to control noxious animals and weeds on Dunedin City Council land and works alongside the legislative roles and responsibilities of the Otago Regional Council and the Department of Conservation to manage pests in the Dunedin city boundary.
8. The Dunedin City Council **supports the aim to halt the decline in New Zealand's threatened species and restore them to healthy populations**, recognising Department of Conservation's vision and themes are closely affiliated with the aspirations of Te Ao Tūroa, in particular:
  - working together in partnerships;
  - landscape-scale management; and
  - managing ecosystems at scale to protect species.
9. The Dunedin City Council, in consultation with seven other councils, proposed a remit calling for Local Government New Zealand (LGNZ) to lobby the Government to develop national legislation for cat control. The remit has been voted in favour by LGNZ, and we are supportive of addressing cat management, including cat microchipping, cat de-sexing and responsible cat ownership.
10. The Dunedin City Council acknowledges a major biosecurity threat to native myrtle species posed by myrtle rust. We support that the Department of Conservation, along with the Ministry for Primary Industries, remains fully committed to developing and taking decisive actions to prevent myrtle rust from spreading.
11. The Dunedin City Council is committed to delivering on **Te Ao Tūroa** by drawing on science, mātauraka Māori and good environment practice. We acknowledge and strongly **support the Department of Conservation's commitment to seeking science-based solutions to dealing with biodiversity threats via the New Zealand's Biological Heritage National Science Challenge**. The Dunedin City Council welcomes opportunities to implement best practice available for managing pests.
12. The Dunedin City Council acknowledges and values the economic importance of conserving biodiversity and threatened species. It is the Dunedin City Council's view that environmentally sensitive wildlife tourism is a key component for the active guardianship of healthy natural environments for current and future generations. Through Te Ao Tūroa, the Dunedin City Council is committed to safeguarding indigenous and taoka species and their habitats and is keen to work together with the Department of Conservation to jointly take a proactive role in achieving these goals.

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<sup>1</sup> Tisdell, C (2007) *The Economic Importance of Wildlife Conservation on the Otago Peninsula – 20 Years On*

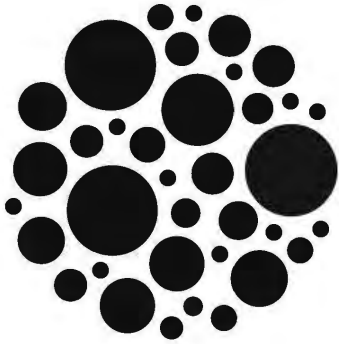
13. The Dunedin City Council actively supports landowners and community groups with their conservation work via Council funds and grants, as well as community board project funds. The Dunedin City Council urges the Department of Conservation to continue to provide support to local community groups and organisations working to protect and steward the threatened and at risk species prioritised in the Threatened Species Strategy.
  
14. This submission is made in the positive spirit of acknowledging and strengthening a partnership with the Department of Conservation that is committed to safeguarding vulnerable threatened species. The Dunedin City Council looks forward to working with the Department of Conservation and other organisations on the implementation of the Threatened Species Strategy.

Yours sincerely



Dave Cull  
**Mayor of Dunedin**





# NEW ZEALAND ECOLOGICAL SOCIETY

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**Submitter details:**

Name of submitter  
or contact person:

[REDACTED]  
Vice-President NZES

Organisation name:  
*(if on behalf of an organisation)*

New Zealand Ecological Society

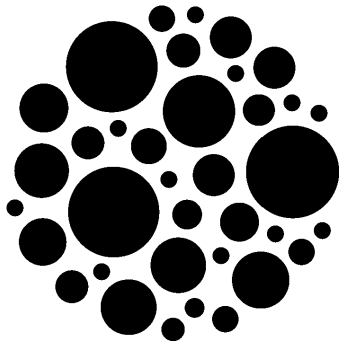
Email:

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*(we accept a typed signature if no electronic signature)*



# NEW ZEALAND ECOLOGICAL SOCIETY

31 July 2017

Threatened Species Strategy  
Department of Conservation  
PO Box 10420  
WELLINGTON 6143

[threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## **SUBMISSION ON THE *DRAFT THREATENED SPECIES STRATEGY***

The New Zealand Ecological Society (NZES) was formed in 1951 to promote the study of ecology and the application of ecological knowledge in all its aspects. NZES is the leading professional society for pure and applied ecology and publishes the *New Zealand Journal of Ecology*, which is the primary peer-reviewed publication for ecological science and research in the country.

NZES currently has a membership of 580, many of whom work with New Zealand's threatened species; either through academic research or applied management. Our membership includes conservation managers, research scientists, applied ecologists, and academics working within the country's universities, Crown Research Institutes, central and local government, private consultancies, and community groups. Through its activities, NZES aims to, among other things, "promote sound ecological planning and management of the natural and human environment".

The Society welcomes the opportunity to provide comment on the Department of Conservation's (DOC) Draft Threatened Species Strategy (the Strategy). We have structured our submission as follows:

- Section I: A summary of key points
- Section II: Responses to the questions provided on the submission form

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## SECTION I: Key points

1. The Strategy provides no basis to improve outcomes for threatened species. That is, there is nothing new in the Strategy, and the Strategy does not “build on existing commitments and programmes”.
2. The Strategy provides no specific actions for implementation and is not supported with additional resourcing or funding. It is unclear how the Strategy will translate to improvements for New Zealand’s threatened species.
3. The Strategy vision is vague, and unmeasurable, and fails to give effect to the purpose of the Strategy. The Strategy, taken as a whole, will not halt the decline in New Zealand’s threatened species, nor prevent non-threatened species from becoming threatened.
4. The Strategy recognises the challenge of protecting New Zealand’s threatened species transcends boundaries. However, the Strategy needs to include greater consideration of meaningful mechanisms for private land, including greater engagement in and support of implementation of the Resource Management Act 1991 (RMA).
5. The Strategy provides no recognition of At Risk species. Nor does the Strategy recognise that without adequate protection and management At Risk species (and currently non-threatened species) will become threatened. Without recognition of the importance of preventing species from becoming threatened in the first instance, it is hard to advocate for their protection. This is particularly an issue for RMA processes.
6. National science capability within DOC and the Crown Research Institutes has been reduced in recent years and this will have a detrimental impact on the ability of DOC to undertake science-based decision-making to achieve conservation outcomes. This capability needs to be strategically increased and targeted at those areas that will improve conservation outcomes. The Biological Heritage National Science Challenge will not be adequate to address critical knowledge gaps and research needs.
7. Plant species have not been well served by the Strategy. For example, there is no action to address herbivores (e.g. hares, rabbits and ungulates) or omnivores (e.g. rodents) in the specific context of protecting threatened plant species. Apart from seed banking, there is nothing in the Top 10 Actions to protect plants.
8. NZES applauds the genuine attempt to apply an objective process to species selection and the effort to make the process transparent.
9. Limiting the species selection process to those species already being managed by DOC has several undesirable outcomes: it reinforces the business-as-usual approach; it fails to provide guidance to other parties undertaking conservation on the highest priority species NOT being managed by DOC; the most highly threatened species are underrepresented; and some taxa benefit disproportionately, while other groups are underrepresented.

10. NZES is encouraged that our Treaty partners are recognised for their role in conservation and that Te Ao Māori and mātauranga Māori will be integrated into species management.

## SECTION II: Questions on submission form

### **1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

11. No. The proposed vision is too long and vague. Only the first sentence in the first paragraph of the vision section (pg. 4) provides the sort of statement suitable for a 'vision'. The vision "aims to safeguard our vulnerable threatened species", however it is unclear which threatened species are our 'vulnerable' ones, or what 'safeguarding' means.
12. The vision does not address the stated 'purpose' of the Strategy, which includes "further steps we need to take not only to restore those species that are already at risk of extinction, but also to prevent others from becoming threatened". NZES supports this purpose, but this requires addressing species *other than and in addition to* those already in one of the three 'threatened' categories of the New Zealand Threatened Classification System (NZTCS).
13. The vision should, at a minimum, include words that precisely express intent, for example to avoid any further extinctions, and to prevent any species from slipping into a more serious threat category, covering all categories of the NZTCS.
14. Taking the document as a whole, the vision appears to avert the most imminent extinctions, but not to halt the 'conveyor belt' of species declines that is moving species closer toward extinction (the most critically threatened species). If this is the case, then the document should state that transparently. If resourcing is driving this restricted vision, the Strategy should explicitly state that DOC has not been funded to do more than this.
15. The vision of the Strategy needs to be revised to one that expresses achievement of the stated purpose, which is to halt further decline in the status of any taxon. If it in fact is not the intention to 'halt further decline in the status of any taxon' then the purpose of the Strategy needs to be changed and an explicit statement included that highlights to the New Zealand public that taxa will continue to decline under the Strategy.

### **2: Are there additional aspects that you think should be included in the vision?**

16. Yes. To give effect to the purpose of the Strategy, the vision (and the entire Strategy) must be expanded beyond its current narrow focus on threatened species that already benefit from management.
17. Based on the information provided in the Strategy, it appears that the 'vulnerable threatened species' that are to be safeguarded (in the vision):
  - Include only those species that are already Threatened **and** already benefit from management.

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- Do not include species that are not managed and therefore perhaps even more likely to be declining.
  - Do not include species that are slipping towards the threatened categories, including but not limited to 'At Risk — Declining' species.
  - Do not include species that have recently slipped into one of the three Threatened categories (Nationally Critical, Nationally Endangered, Nationally Vulnerable). This is because it appears that the threat status of a number of groups (such as plants) has been revised since the algorithms used to support the Strategy were run.
18. The vision needs to be reformulated to provide a clear, ambitious, and precisely worded statement that engages with and supports the purpose of the Strategy. This requires a vision statement that explicitly addresses **all** species that are slipping towards extinction, including those in the 'At Risk' categories of the NZTCS, not only a subset of threatened species that are already managed.

**3: Do you agree with the characterisation of the value and current state of our native species?**

19. No. There are two key aspects missing:
- (1) consideration of At Risk taxa, and
  - (2) information on trends in the overall number of species considered Threatened and At Risk across the several iterations of the NZTCS process.
20. The graphic describing the current state of our species fails to mention that there are a whole lot more species classified as At Risk in each taxonomic group. The following section on 'defining the risk' ignores these by excluding these categories from the table. This has the effect of minimising the perception of the problem, and failing to give effect to the purpose of the Strategy.
21. A minor associated detail is that the chart suggests fewer than half of bat species are threatened whereas the numbers provided show that 3/5 (more than half). This raises the question of whether other rows in the graphic are also minimising perceptions of the problem in addition to excluding At Risk species.
22. The set of species recognised as threatened in New Zealand is generally growing. This growth is documented in several iterations of the NZTCS. For example, in groups such as freshwater fishes, reptiles and plants, there is a clear trend for species that are considered to be At Risk — Declining in an earlier iteration to slip into higher categories as time goes on. DOC has these data (and they are now readily available online). These data are essential context for describing the current state of our native species and why we need a comprehensive strategy to address it.
23. The following actions are required to address these issues:
- Document and describe numbers of At Risk species and trends across all categories of the NZTCS. Specifically:
    - a. Checking that the bars in all rows of number of Threatened species by broad taxonomic group correctly represent the numbers provided.

- b. Adding another colour and category to show the number of At Risk species in each group.
- c. Add At Risk categories to the table in the section 'defining the risk'
- d. Add columns to the table in the section 'defining the risk' which show the numbers of species in each category across different iterations of the NZTCS, or alternatively add a bar chart which shows these.
- e. Add narrative that describes the above.

**4: Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?**

- 24. While none of the listed tools are 'wrong', the list is dominated by business-as-usual activities. The urgency and size of the task required to meet the purpose of the Strategy justify far greater innovation and action than simply a list of tools and initiatives that are already being used or are in development. Business-as-usual will continue, not alter, the current trend toward extinction.
- 25. The application of many of the technical tools listed in this section is constrained by the absence of meaningful legislative tools. This lack of useful legislation is recognised in the Strategy, but commitments to address the problem are vague and insufficient.
- 26. The status of threatened species nationally, and the trend for the numbers to keep growing, warrants specific new legislation. One such initiative would be an 'Endangered Species Act', which would ensure that protection of threatened species is prioritised across the spectrum of resource management decisions and address key gaps in, for example, the Wildlife Act and the Native Plant Protection Act. Further, there are likely to be simple amendments to existing legislation that would help greatly to address the problem of species declines, but these do not appear to have been considered. The Strategy needs to specifically identify the goals of, and new powers required in, new and existing legislation to protect threatened species and their habitats, including on private land and in the freshwater and marine environments.
- 27. The strategy makes two references to new marine legislation, but it is not clear yet whether or how that proposed legislation will help threatened species. Flexibility (referred to in the ten top actions) in marine legislation does not necessarily assist endangered species, this depends on how it is enacted and implemented. The Strategy needs to state what is needed to address the problem of marine species declines, and have a plan of action should the notional new marine legislation not provide that.
- 28. Relying on the development of a National Policy Statement (NPS) for the protection of biodiversity on private land does not provide any clarity or certainty for the protection of threatened species. The process for developing a NPS on biodiversity has been underway on and off now for two decades, further undermining any confidence in the outcomes of the current process. The Strategy needs to include a plan of action should the NPS not deliver necessary protection for threatened species on private land (beyond voluntary *ad-hoc* initiatives).

**5: Are there other tools we could use to help us achieve the vision?**

29. Yes, the following additional tools should be incorporated into the Strategy:

- i. *New and amended legislation.* As detailed in the response to Question 4 above.
- ii. *Cross-agency commitment.* The Strategy appears to be DOC's strategy. Yet the seriousness of the need warrants cross-government (including local government) commitment, with relevant agencies, departments, and ministries signed up to a clear policy focussed on securing threatened species and their habitats, preferably with specific actions. Critical to success are (at least) territorial local authorities; Ministry for the Environment; Ministry for Primary Industries; Ministry of Business, Innovation and Employment; Land Information New Zealand; New Zealand Transport Authority; and Treasury.
- iii. *Economic instruments.* The range of tools could be expanded both nationally and regionally. For example, economic instruments could potentially be designed to reduce commercial incentives to degrade threatened species habitats and/or increase incentives and provide revenue to protect and manage them. These and other potential tools should be noted and their development promoted.  
Addressing the zero-sum environmental vs. economic wellbeing trade-off is central to economic and socio-political challenges facing effective conservation. There are potential ways to do this that could improve equity and the economic and environmental wellbeing of nearly everyone (see Brown & Stephens 2017<sup>1</sup>, Stephens et al. 2016<sup>2</sup>).  
This leads to a key missing theme: rectifying the systemic institutional incentives that cause the human behaviours that erode species' security and drive underfunding of conservation. While the underlying causes are quite well understood and some good solutions have been proposed, there is opportunity for further innovation. Currently, the Strategy does not appear to consider these barriers to the protection of New Zealand's threatened species.
- iv. *Data sharing.* A fully-featured shared database for storage and retrieval of species distribution data.
- v. *Herbivore management.* Research on threats posed by herbivores (e.g., goats, rabbits, hares, pigs, deer and chamois) to Threatened plants and development of tools to manage them.

**6: Will the proposed goals help us achieve the vision and assess our progress?**

30. The Strategy provides no basis to be confident that the proposed goals will help achieve the vision. The goals would not "prevent others from becoming threatened" as stated in the purpose of the Strategy. This view is based on understanding the first two goals to be:
- i. improve the security of 150 species which already receive some management, and

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<sup>1</sup> Brown MA, Stephens T 2017. Big issues, bigger solutions: are bottom lines enough? Policy Quarterly 13: *In*

<sup>2</sup> Stephens T, Greenhalgh S, Brown MA, Daigneault A 2017. Enhancing the tax system to halt the decline of nature in New Zealand. Policy Quarterly 12(1):26–34.

- ii. take some action to reduce the likelihood that a further 350 threatened species do not go extinct. However, these 350 species may continue to decline and almost all, or all of these already receive some management<sup>3</sup>.

The goals do nothing for any other Threatened or At Risk species and thus will not prevent further declines.

31. Since existing management was a prerequisite for a species to be selected for inclusion in the Strategy, it is not clear that the goals are fit to be described as “**further** steps we need to take... to restore those species that are already at risk of extinction”. That is, the goals promise more than the Strategy attempts to deliver.
32. It is unclear how the proposed goals will help measure progress towards achieving either the vision or the purpose of the Strategy. As noted above, the vision does not give effect to the purpose of the Strategy, and is too vague to assess progress or success.
33. Supporting research is neither a goal and nor is it measurable. It is simply good practice and a critical ingredient for success. The scope of the relevant research proposed is unrealistic in relation to its proposed funding source. Further, it is not only data deficient species that need further research. Research is essential to understand what has to be done to secure many species, and much or indeed most of this will need to be done outside the science challenge. DOC needs to develop a research plan to support the purpose of the Strategy. Such a plan would need to be properly scoped to determine the research required to achieve the purpose of the Strategy, the cost of delivering this research, and identify realistically how that will be resourced and by whom it will be done.
34. The integration of Te Ao Māori and mātauranga Māori into species recovery is needed, indeed, Te Ao Māori and mātauranga Māori should provide an integral foundation for the Strategy. However, the third goal appears to be in fact describing what should be an underpinning ethos rather than a goal.

***7: Are there alternative goals that you think will better achieve the vision and assess our progress?***

35. The proposed vision is inadequate to deliver the purpose of the Strategy and this needs to be addressed in the first instance.
36. There are several goals that would better achieve the purpose of the Strategy:
  - Threatened species are managed across their entire range in order to protect (in priority order) their genetic diversity, total population size, and geographic range.
  - Primary, secondary, and tertiary agents of decline are identified (or recognised as unknown) for all classified threatened species.
  - Strategic effort to address each agent of decline reflects its importance as indicated by the number and endemism of taxa affected by each agent.

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<sup>3</sup> the ‘General Explanation’ text supporting the ‘Strategy algorithm’ states there are 483 threatened, at risk or conservation dependent taxa that currently benefit from DOC management, and 50 species are selected because they are culturally valued.



- Conservation management prevents further decline of threatened species that occupy large geographic ranges.
- Refuge habitats are identified and protected from agents of decline.
- Develop and promote novel economic instruments to fund threatened species conservation and dis-incentivise loss and degradation of their habitats.
- The Department of Conservation recognises the importance of being a strong and respected advocate for the protection of threatened species potentially impacted by development.
- Priority for management is based on maximising biodiversity retention by focusing on vulnerability to loss and contribution to national biodiversity.
- Protocols and rules are developed for the deployment of all pest control methods and devices to eliminate population-level risk to threatened species.
- The number of threatened species under management and recovering or steady or declining is reported annually along with the number not managed and the number of these known to be declining or steady.
- Management actions for one threatened species will not undermine conservation goals for another species.

### ***8: Have we identified the right strategic themes?***

#### *Uniting against invaders at a landscape scale*

37. Achieving a sense of common purpose is a prerequisite for success. However, the focus on invaders leaves many hard and important issues unaddressed. For example: the ongoing loss, fragmentation and modification of threatened species habitats across production landscapes and incompatible land uses; opposition to 1080 and to cat control; the partnership approach and consequent relationships with commercial interests have been shown to compromise DOC's capacity for independent, objective risk assessment, and effective action. These issues need to be included as additional strategic themes in the Strategy.

#### *Managing ecosystems at scale to protect species*

38. Managing ecosystems is really important for the protection of species. The protection of refuge ecosystems — places that are less hospitable for agents of decline than for the species they threaten — is also very important; for example, cold beech forests, or acid peat bogs. The issue of scale is critical, both to control pests and to protect threatened species effectively. The Moehau example provided in the Strategy is not necessarily representative as it is a relatively large scale site. However, many of the priority sites for threatened species management are small patches within a more extensive matrix that is managed in a way that threatens species persistence.

39. The Strategy needs to specifically address the diverse and multiple barriers (including social) to managing threatened species at scale and how these are to be overcome.

#### *Building our science and knowledge base*

40. This is an essential strategic theme. The Strategy should acknowledge that 'our conservation success stories' rely on the assembly of reliable knowledge through excellent science. The important issue not addressed here is that funding and capability in conservation science has

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been cut back not only in DOC but its supporting research agencies (for example, Landcare Research's Strategy 22). This reduction in funding and capability will compromise the ability to protect New Zealand's threatened species long-term.

41. The Strategy needs to address the gaps in resourcing and capability, and provide a credible way forward, through targeted MBIE funding for example.

*Focusing beyond conservation land*

42. This is a sound strategic theme. However, this theme needs to be supported by narrative and statistics that show where the problem lies and where to focus. How many and what types of threatened species occur on private land or leased public land? How many and what types are mostly located on private or leased public land? How many are now threatened because of past and current ongoing habitat loss and modification, and/or by other pressures, and where? This is the sort of contextual information required to direct conservation effort beyond public conservation land. For example, a well-intentioned large predator control project will yield few benefits for threatened species if there is little habitat remaining, and few species present that can benefit from the predator control effort.
43. This strategic theme needs to include acknowledgement of the key role that DOC should play in advocacy for conservation on private land, and in particular in resource management decisions under the RMA. DOC has been largely absent in this arena for the last decade, and NGOs have been forced to pick up that role with far fewer resources and less expertise, compromising the purpose of this strategy. DOC needs to commit to resourcing and supporting this role and that the role is not watered down by a 'whole of government' approach.
44. The Strategy focuses on the as-yet undeveloped NPS for the protection of biodiversity on private land. The outcome of the stake-holder lead Biodiversity Collaborative Group process for developing the NPS is highly uncertain. There are no assurances of how a future NPS will provide for the protection of species and habitats through RMA processes. This is particularly uncertain given that the development of the NPS involves a collaborative approach. Collaborative approaches risk prioritising consensus over the best outcomes for biodiversity protection. The NPS development needs specialist and ecological input at every stage.
45. A NPS is only one approach to managing biodiversity on private land and the Strategy would benefit from a discussion of the alternative and complementary approaches and options for private land, and which have and have not been tried and tested to date, giving clearly articulated reasons for those preferred in a coherent way forward.
46. Voluntary covenants (e.g. QEII Trust Open Space Covenants) are an effective mechanism supporting landowners who wish to protect biodiversity on their property. However, the effectiveness of voluntary protective measures should not be overstated, nor solely relied on. Threatened species tend to occur in areas and habitat types that continue to be subjected to land use pressure (e.g. wetlands, drylands). Regulatory protection and statutory advocacy through RMA processes is needed to protect habitats and address land use pressures alongside voluntary non-statutory mechanisms. The Department needs to work more closely and effectively with local government, and ensure regional and district plans have policies and

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rules protecting and avoiding adverse effects on threatened species and habitats and this needs to be reflected in the Strategy.

47. DOC and local government need to work in a more unified way across the country (and not just a scattering of collaborative projects) to make a step-change in biodiversity conservation on private land. The Strategy does not extend past generalities to describe how this might be achieved.
48. The Strategy places importance on working with communities and landowners to protect and manage biodiversity on private land. However, in the absence of detail of how the Department will support community groups these are trite statements.

#### *Working together in partnerships*

49. Conservation is achieved via collaborative relationships, some of which might be properly described as partnerships. However, the critical issue is identifying and implementing the collaborations and partnerships that enable, not undermine, threatened species conservation. The strategy needs to recognise and address this.
50. DOC has been involved in collaborations over the last 5–10 years which have had regrettable outcomes for conservation in New Zealand, and undermine DOC's mandated role in protecting New Zealand's biodiversity for all New Zealanders. Specifically, agency capture arising from inappropriate partnerships, driven by political influence, is deflecting DOC from its primary purpose of conservation, and impeding threatened species protection and recovery. There is little accountability for what is achieved, and as importantly, what is not achieved for conservation through and because of these partnerships. A high profile recent example of this problem is the nature of DOC's involvement in the process leading up to and including the recent Supreme Court 'Ruataniwha' decision.
51. The Ruataniwha example indicates that DOC's advocacy role has been deflected in support of the government's primary production growth agenda. The risks of partnerships to DOC and conservation generally are very clear now, and these should be explicitly recognised. The Strategy needs to consider and propose ways (e.g. such as a transparency protocol, perhaps including independent audit) to protect DOC from agency capture that deflects it into 'honouring partnerships' ahead of protecting biodiversity generally and threatened species.
52. In recognising that conservation is bigger than the DOC, the scope for partnerships should be explored across the spectrum. The Strategy should include a commitment to collaborations with environmental NGOs, particularly in providing advocacy into difficult and contentious challenges in species recovery. That is, partnerships with industry groups and business interests should not preclude opportunities for achieving better conservation outcomes by working with other conservation-focused organisations.
53. Additionally, the species prioritisation process should include all Threatened species (not just those managed by DOC) to provide guidance on the highest priority species to others that are doing conservation.

## **9: Do you agree with our top 10 actions?**

### *Achieve the Predator Free 2025 goals*

54. Before adopting the Predator Free New Zealand 2050 (PFNZ 2050) goals outright, they need to be assessed for their appropriateness for achieving outcomes for threatened species as per the Strategy's purpose. For example, removing only rats, possums, and stoats may enhance cat and mice populations, with even more fatal effects on some smaller taxa such as invertebrates and lizards.
55. The PFNZ 2050 goals are not funded, nor have actions to achieve them been identified or planned. It is therefore doubly unclear what this action means for addressing declines in Threatened and At Risk species.
56. In two authoritative recent review papers in the NZES journal (The New Zealand Journal of Ecology), Parkes *et al.* (2017a,b)<sup>4,5</sup> concluded that:  
*"The national scale pest- or predator-free aspiration is not currently (and may never be) feasible and risks diverting resources from more optimal solutions",*  
and that  
*"The risk with the vision is that, despite local and international enthusiasm, it may distract focus and resources from advancing the practical improvements we know we can achieve under the current or enhanced mainland island/network models"*
57. Further, with respect to the island eradications 2025 goal, the second paper cautions that  
*"The Government's interim 2025 goal to eradicate all mammalian predators from nature reserves is, in practice, limited to the Auckland Islands"*<sup>5</sup>.
58. The reasons why PFNZ 2050 actions are deemed to be appropriate for threatened taxa need to be included in the Strategy, based on analysis of whether each one is realistic and compatible with the Strategy purpose. Potential incompatibilities with species recovery, including those set out in the Parkes *et al.* papers, must be considered in the Strategy, with a clear plan to either replace these goals, or mitigate those effects.

### *Continue to invest in improving tools and technologies for predator control*

59. Continued and increased investment in improving tools and technologies for predator control is appropriate. However, protocols are necessary to prevent agency capture and a precautionary approach taken until new tools and technologies are proven to be both safe and free of perverse outcomes. This can be addressed by including a transparency protocol in the Strategy (see also *Working together in partnerships*, above).

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<sup>4</sup> Parkes, JP, Nugent G, Forsyth DM, Byrom AE, Pech RP, Warburton B, & Choquenot D 2017a. Past, present and two potential futures for managing New Zealand's mammalian pests. *New Zealand Journal of Ecology* 41(1):151–161.

<sup>5</sup> Parkes JP, Byrom AE, Edge KA 2017b. Eradicating mammals on New Zealand island reserves: what is left to do. *New Zealand Journal of Ecology* 41(2): 263–270.

### *Seed banking*

60. Seed banking is a useful action to include in the Strategy. However, there needs to be recognition that seed banking is only a partial response and in no way represents 'problem solved' for threatened plants. Seeds stored in banks do not have an infinite life-span and some species only have a low proportion of seeds that are viable. Further, it costs less, is easier, and is more effective to protect and/or restore existing populations than it is to attempt to rescue species that we are close to losing or to re-establish populations from seed banks.
61. The Strategy needs to acknowledge and provide a plan to address the actual or perceived risk of perverse outcomes from seed banking.

### *Biosecurity 2025*

62. Without specifically researching this document and evaluating its utility as a contribution to threatened species recovery, we are unable to determine the relevance of this action.

### *Progressing regulatory reforms*

63. This is a critical action for the Strategy, but it is inadequately dealt with as it is currently presented. The Strategy only considers a couple of reforms already underway and makes no attempt to identify the key legislative amendments needed to facilitate threatened species protection and recovery. Reforms such as the RMA amendments, and recent changes to the Environmental Legal Assistance fund, and their implications for threatened species are not mentioned. A pathway for the thorough analysis of where amendments to current legislation<sup>6</sup> or new legislation is required needs to be included in the Strategy (see also our response to Question 4).

### *Implement freshwater reforms*

64. This action belongs under the previous heading '*Progressing regulatory reforms*'. The Strategy should identify which (if any) threatened freshwater species will benefit from these reforms, and which reforms offer most benefit to most species. Further, an analysis of where the freshwater reforms may have a negative impact on New Zealand's freshwater species needs to be undertaken.

### *Identify and publish 'hotspots'...*

65. This action, as it is presented, is poorly thought through, with little indication of who would use this and how it should be done to maximise utility. Important risks need to be addressed. In the absence of a coherent associated strategy to turn threatened species into assets, rather than liabilities, for many private landowners with development aspirations, this could facilitate a 'shoot, shovel, and shut up' approach to conservation on private land. Lizard conservation is unlikely to be fostered by providing poachers with maps of hotspots. This action should be removed from the Strategy unless all associated risks can be addressed.

### *Select 500 data deficient species...*

66. This action is also poorly developed. The number of species to focus research on is arbitrary and the proposed pathway to address it completely inadequate. New government funding

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<sup>6</sup> For example, the Wildlife Act 1953 needs to be revised or replaced with a new act that includes plant species.

for the research, through a targeted fund matched to the size of the need, is required. Targeted research funding needs to be incorporated into the Strategy as both a goal and an action. Additionally, data deficient species are not the only ones that need research — for 300 of the 800 threatened species identified in the Strategy, we don't know enough to decide how best to manage them. Research is needed on understanding key threats and species' ecological requirements so they can be managed in the wild.

*Ensure that national recovery planning systems and processes are fit for purpose, efficient and incorporate mātauranga Māori.*

67. This seems reasonable but is completely non-specific. What is 'fit for purpose'? Efficient from whose perspective (Māori, species' recovery, managers or field staff)? This action needs to be further developed and specifically, to become meaningful. The integration of mātauranga Māori should be a foundation principle of the Strategy.

*Develop a monitoring scheme...*

68. Monitoring is an essential action. However, the Strategy lacks details about scope and timeframes. The Strategy needs to provide details of a monitoring system for threatened species and the identification of intervention needs, including details of what is required to achieve this and a timeframe for delivery. The Strategy should also identify how the monitoring programme would support and enhance threatened species management.

**10: Are there any other actions that should be included, and any actions that should be removed?**

69. There are key actions missing from the Strategy. Based on the suite of goals proposed under Question 8 (above), the following is list of actions that would materially contribute to securing our threatened species:

- i. As part of the species threat classification process, for each taxon:
  - Map its known locations and likely present distribution and potential distribution.
  - Identify where protection is required to maintain the taxon's genetic diversity, population size, and geographic range.
  - Identify and rank suspected agents of recent and anticipated decline.
  - Assess and quantify taxon vulnerability to further status decline.
- ii. Rank the national importance of agents of decline according to the number of taxa impacted by each agent. Use these ranks to prioritise strategic national initiatives for development and application of pest (including predators, browsers and weeds) control methods, legislation and policy development, publicity and research pertaining to agents of decline.
- iii. Determine how the prioritisation process and algorithm could be refined to:
  - Give appropriate weight to vulnerability relative to representation in order to maximise biodiversity retention.
  - Identify the optimum geographic extent of management to maintain taxon genetic diversity, number of individuals and geographic range
  - Account for risks and feasibility of achieving desired outcomes for the taxon
  - Account for management synergies for co-located threatened species
  - Account for representation change resulting from:
    - gains and losses to populations of the taxon elsewhere and

- gains and losses to related taxa.

70. See also our proposals for improving and expanding actions as detailed in our response to Question 9.

**11: Have we identified the right number of priority species?**

(Circle or highlight one)      • Too many      • About right • Too few

71. The Strategy currently identifies too few priority species (see our earlier comments regarding At Risk and unmanaged species).

**12: Have we identified the right priority species?**

72. There has been a genuine attempt to apply a reasonably objective process to species selection within severe political and funding constraints — earlier points about needing to consider At Risk species and unmanaged species notwithstanding. There has also been a commendable effort to make the process transparent.

73. However, many taxonomic groups are missing from the lists. This requires an explanation as to why this is, what the practical limitations are, such as insufficient taxonomic understanding, and how excluding these biotic groups impacts on achieving the purpose of the Strategy.

74. Limiting the species selection algorithm to those species already being managed by DOC may have resulted in a major bias in the prioritisation process. This subset of species already being managed is based on DOC's ecosystem management unit (EMU) approach. While this EMU approach has merits, given limited resources, proportionally fewer highly threatened species (i.e. those classified as Nationally Critical and Nationally Endangered) are benefitting from ecosystem management than less threatened species. This Strategy should be making sure that highly threatened species don't fall through the gaps, and it doesn't do that. Additionally, the EMU approach benefits a disproportionately high number of vertebrates and a disproportionately low number of plants and invertebrates. This is exacerbated by the fact that 82% of the 50 Notable species are vertebrates (mostly birds).

75. There also seems to be a mismatch between the algorithm's intent to value depth of endemism (which we would agree with), and to account for relatedness among taxa in the listed priority species.

76. This mismatch is illustrated by the following clear anomaly. The plant list includes at least seven species of *Lepidium*, six of them Cook's scurvy grasses, which are about as closely related to one another as species can be. Indigenous Brassicaceae are over-represented in our list of threatened plants because they are susceptible to a similar suite of pressures. However, the genus is not endemic, coastal taxa are particularly recently-derived, and arguably the inland *Lepidium* species have a longer evolutionary history and are more distinctive.

77. In principle, the priorities should allow us to retain as much of the tree of life as possible, with an emphasis on those branches of the tree of life unique to New Zealand. Why are each of the terminal coastal *Lepidium* 'leaves' included in the Strategy, while similarly-rapidly declining species on completely different branches, not found anywhere else in the world, are not? The algorithm needs to be interrogated to determine and explain why obvious anomalies such as the *Lepidium* example result, and adjustments and corrections made accordingly.
78. This may signal a problem with the weightings, or with the conceptual foundation of the algorithm. It may be that endemism needs multiple weightings (not just 0.9 vs 1.0), so that there is most weight on taxa that are endemic at the level of order, then family, then genus, then species and subspecies levels, and the lowest weight is given to taxa that are non-endemics at all levels (e.g. Australasian bittern, which although nationally critical, also occurs in Australia). The algorithm should differentially weight species according to the taxonomic level at which the species is endemic.
79. A further concern with the application of the algorithm is that the Strategy appears to promptly ignore the process (for the next five years at least) by picking 50 species as top priority for management based on social factors alone. Fifty species represents a third of the total number of species flagged for management over the next eight years. Social factors are important drivers in conservation decision-making, but additional funding for these socially important species, if they have not also been identified as priorities through the objective application of the algorithm, is required.

**13: Do you think other species should be prioritised ahead of the ones listed? And why?**

80. This question has been addressed in the response to Question 12 above.

**14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

81. The proposed vision, focus themes, goals and actions on the identified species will not set the framework for safeguarding our vulnerable threatened species. The reasons for this view are outlined in the responses to the questions above.



# New Zealand's Threatened Species Strategy: submissions for consultation

#136

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

[REDACTED]

Organisation name:  
(if on behalf of an organisation)

New Zealand Lizard Technical Advisory Group

Email:

[REDACTED]

Signature:

(we accept a typed signature if  
no electronic signature)

[REDACTED]

## Submission:

### You can answer all or some of the questions.

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

The vision includes a statement about existing national initiatives (PF2050, Battle for our Birds, War on Weeds) that are at the heart of achieving the safeguarding of our vulnerable threatened species. However, these major initiatives fail to tackle the full suite of invasive mammalian predators that threatens our biodiversity. PF2050 is likely to ultimately make the situation worse for all our threatened lizards and many invertebrates as mice are released from predation by rats and stoats, and weasel and cat populations are released from competition. It would be fantastic if the vision were more inclusive of understanding and controlling the full range of mammalian predators that threaten our biodiversity.

2: Are there additional aspects that you think should be included in the vision?

Within the “predator-free” vision we would like to see additional emphasis placed on **controlling other invasive predators, particularly mice, weasels, hedgehogs and cats** to protect NZ lizards and other biodiversity. As predators such as rats and stoats are controlled (under the PF2050 initiative), there is the potential for harmful effects on native reptiles and frogs to **increase** if the remaining mammalian predators increase in abundance and/or switch their prey. In as many cases as possible, we would like to see the full range of mammalian predators controlled at sites where threatened lizard species are present, rather than just a subset of predators.

3: Do you agree with the characterisation of the value and current state of our native species?

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

Investment in **pest control** tools and techniques is missing from the list. Continued investment in tools for species we can control is needed, and development of tools to control mice (and other predators) at a landscape scale are urgently needed, while novel technology (e.g. gene drive, new biocontrols) are developed.

5: Are there other tools we could use to help us achieve the vision?

6: Will the proposed goals help us achieve the vision and assess our progress?

We seek greater clarity about what is meant by “enhanced national population”. The definitions on p. 29 of the draft strategy are not specific and would not enable clear measurement or reporting of implementation of the strategy.

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

Add a specific goal about gaining knowledge about, and thereby reducing the number of, Data Deficient species.

8: Have we identified the right strategic themes?

In addition to the 5 strategic themes identified we suggest that climate change be identified as a key theme that will be critical to securing our biodiversity.

We also suggest the following detail be included under existing themes:

- The “United against invaders” theme needs to **address a broader range of invaders**, including mice, hedgehogs, weasels and ferrets.
- Under the “Managing ecosystems at scale to protect species” theme, it is important to acknowledge that many threatened species need comprehensive management of a much greater range of pests than can be achieved at landscape scale. It is easy to fall into a trap of reporting on hectares with pest control while species within those hectares go extinct.

9: Do you agree with our top 10 actions?

Yes, in general, but see below for suggested improvements to them.

10: Are there any other actions that should be included, and any actions that should be removed?

Action points 1 & 2: be more inclusive of the **full suite of invasive mammalian predators** that prey on native biodiversity, rather than the narrow focus on the five PF2050 species (rats, stoats, possums). This is critical to protecting all native lizard species as well as many of the invertebrates and birds.

Because of their small size and slow reproduction, lizards are particularly vulnerable to predation by mice, which currently lack landscape-scale management tools. This leads to a very high risk of lizards not benefiting from predator control programmes which are sufficient to allow recovery of bird communities. Large invertebrates share the same vulnerability, but are usually buffered by higher fecundity. This combination of circumstances makes lizard conservation uniquely difficult and expensive, so addressing landscape-scale mouse control tools is particularly important for lizard conservation.

Action point 5 should make specific mention to climate change as a key threat requiring regulatory/policy reform in order to minimise impact on native biodiversity.

Action point 8 needs to be more proactive than simply listing 500 data deficient species for further work. It needs to be targeted around securing funding to reduce the list of data deficient species to a target number and understanding enough about them to give them a threat ranking and (if appropriate) stream them for management. A *goal* around data deficient species would be useful to this end too.

Action point 9 could be made more useful and specific. E.g. *implementing* the proposed National Heritage Specialist Groups with sufficient resources to achieve their goals would be a good start.

Action point 10 would be more useful if it included targets around proportion of taxa that will receive both treatment *and* non-treatment monitoring to evaluate effectiveness of management interventions.

11: Have we identified the right number of priority species?  
(Circle or highlight one) • Too many • About right • **Too few**

**Comments:**

12: Have we identified the right priority species?

We would like to see **greater emphasis on the Threatened species and Data Deficient species** as opposed to the At Risk species (particularly those without a decline profile that are listed as Relict or Recovering).

13: Do you think other species should be prioritised ahead of the ones listed? And why?

Overall, we support the algorithm used to rank species and the principles it encapsulates (i.e. complementarity, taxonomic representativeness, cost and likely success of management). We think it's very important to use the latest information, including threat listings, when creating an up-to-date list. We fear that the lizard information is still based on the 2012 listing rather than the 2015 one, which is why some substitutions are necessary on the reptile list. In upholding the core principles of species prioritisation, but focussing on the most urgent taxa, we suggest the following tweaks to the list of 150 priority species:

- ADD Alborn skink (Nationally Critical) – potential for extinction in 5 years without management
- ADD cobble skink (Nationally Critical) – potential for extinction in 5 years without management

- ADD Tautuku gecko (Nationally Endangered) – known from only 2 sites, both on private land with no pest control, extremely low detection rates for this species
- REPLACE jewelled gecko (At Risk – Declining) with rough gecko OR starred gecko OR West Coast green gecko – all of these are beautifully patterned green geckos, but the latter three are considered Nationally Vulnerable and are at greater risk of extinction than the jewelled geckos which are currently listed.
- REPLACE Cook Strait striped gecko with Coromandel striped gecko. Both are Nationally Vulnerable, but the latter doesn't have a secure mammal-free island population.
- DELETE Duvaucel's gecko (At Risk – Relict) – secure populations on multiple mammal-free offshore islands
- DELETE Tuatara (At Risk – Relict) – secure populations on multiple mammal-free offshore islands

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

We are not confident that our vulnerable species will be safeguarded by the strategy. In particular, the narrow focus of PF2050 and emphasis on this as a panacea for declining native fauna is naïve. Landscape level control of a few key predators may actually be detrimental to lizards and some other native fauna. A more holistic approach to multi-species pest control is urgently needed to protect the vast majority of native biodiversity, as opposed to just the large, iconic birds. Specifically, urgent work is needed to evaluate threats posed by mice, weasels, ferrets, cats and hedgehogs and control options for these to protect native lizards and other fauna. Furthermore, we have identified species that we think may be extinct within 5 years without management intervention that are not on the list of 150 priority species. Other species are so data deficient that we can't even begin to manage them.

Work on the full suite of mammalian predators and on better understanding data deficient species needs to be captured by the strategy and funded by increased core funding to DOC, as it is basic biological research that is not likely to be funded by National Science Challenge or other initiatives.

15: Do you have any further comments regarding the draft Strategy that are not covered above?

# New Zealand's Threatened Species Strategy: submissions for consultation

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## Submissions must be received no later than 5pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

[REDACTED]

Organisation name:  
(if on behalf of an organisation)

Trees for Hawke's Bay

Email:

[REDACTED]

Signature:

(we accept a typed signature if  
no electronic signature)

[REDACTED]

## Submission:

You can answer all or some of the questions.

### 1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

*No – This vision lacks ambition when it comes to protecting our threatened and at risk native species. It needs to honour New Zealand’s international commitments;*

*To restore viable populations of all our threatened and at risk species across their natural range and maintain their genetic biodiversity.*

*This could be encapsulated by a vision based on that recommended by the Parliamentary Commissioner for the Environment’s recent Report on the state of our native birds.*

*“The restoration of abundant, resilient and diverse species and habitats across their natural range.”*

*To achieve this, the Strategy’s vision needs to be much more ambitious than just aiming to safeguard 20% of our threatened species by 2030. Like Predator Free New Zealand it needs to aim high and look to safeguard all our threatened species by setting clear goals for significant increases in the number of threatened species that will be actively managed for their restoration; i.e.:*

- ***All** threatened and at risk species will be protected, not just 20% of them, and*
- ***All** threatened and at risk species that are conservation dependent will be under intensive management setting them on a path to recovery.*

*The vision for Predator Free NZ by 2050 – is supported.. This needs to be expanded to include the other key introduced predators, especially mice, ferrets, weasels and feral cats.*

*“Battle for our Birds” is supported but needs to be expanded so that all of the public conservation land needing predator control is under regular sustained predator control. This would only cost around \$50 million a year (based on roughly 7million ha receiving control once every 3 years with an average cost of \$7 per ha).*

*Until we have eradicated all introduced predators we need to make sure that our threatened species survive and no more species become threatened. To do this we will also need comprehensive, landscape – scale, predator control on land outside of the conservation estate.*

*The “War on Weeds” also needs to be expanded from the dirty dozen as this is less than 4% of the 350 weeds which currently threaten nature. Weeds such as lupin, broom, poplar and gorse are urgently in need of control in some habitats where there are many threatened species such as braided river beds and lowland dryland sites.*

### 2. Are there additional aspects that you think should be included in the vision?

The vision should address:

- the need to halt the loss of habitats that support threatened species
- Increased emphasis on improving our knowledge of the threats to, and conservation status of, species.
- Actions for threatened marine species.

The vision is focused on land based threatened species and actions to assist them, yet there are large numbers of sea birds threatened with extinction as well as dolphins, whales, sealions, marine fish and invertebrates.

The vision and actions of the Strategy need to incorporate an all-of-government approach to protecting threatened and at risk native species. The actions (or lack of action) of many government agencies have significant impacts on our threatened species. All government agencies should have a responsibility under the Strategy to ensure that their policies and actions support the restoration of threatened and at risk species.

### 3. Do you agree with the characterisation of the value and current state of our native species?

Yes Agree with the value of our biodiversity.

The Trouble in Paradise section of the strategy needs to recognise the impact of the commercial harvest of threatened species, such as whitebait species and Long finned eels, and the continued clearance of habitats of threatened species for commercial development such as farming intensification, urban expansion and infrastructure such as motorways.

The state of our species section needs to be more specific so that it is clear that for example what percentage of our birds, or reptiles, are threatened, and what the trends are for each group of species.

### 4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

The Strategy needs to require that all critically threatened species that would benefit from detailed management plans also have dedicated recovery groups that oversee the production and implementation of those plans.

The Strategy places too much emphasis on the need to prioritise the work between threatened species. This emphasis appears to be driven by the lack of resources, rather than conservation need. All threatened and conservation dependent species need to be managed for protection and there needs to be flexibility to be able to work on species that may not have been prioritised, but where an opportunity or a necessity arises.

Captive management should only ever be a last resort tool, as the priority for threatened species must be conservation in situ.

While Fenced sanctuaries serve a useful purpose, they should not be prioritised over conservation of threatened species in situ.



*As the Parliamentary Commissioner for the Environment's recent report notes, translocations are expensive and risky and should be evaluated against the overall benefit of the species and against the benefit of using the same resources to control predators, or to provide other assistance in the in situ restoration of threatened species.*

*The development of native threatened plant and habitat protection legislation is supported..*

*Support the adoption of a comprehensive National Policy Statement on Indigenous Biodiversity under the RMA.*

*Support greater use of legislation, regulation and policies to ensure that human actions do not further threaten species, for example zero bycatch of threatened species in the fishing industry, no clearance of threatened species habitats.*

*Development of a National Policy Statement on indigenous biodiversity is supported provided it sets bottom lines for biodiversity protection on private land, that will achieve the vision and the goals needed to protect and enhance all our Threatened and At Risk native species and prevent others becoming threatened.*

## **5. Are there other tools we could use to help us achieve the vision?**

*The best possible tool is to ensure that the Department of Conservation is adequately funded to undertake all the steps necessary to restore all species at risk of extinction and to prevent others from becoming threatened.*

*The government needs to also adequately resource science to identify the threats and agents of decline and develop management prescriptions*

*Tools and resources are needed to ensure the monitoring and enforcement of existing legislation, policies and regulations at the central and regional and local government levels.*

*Utilise the Crown's tenure review process to secure high country threatened species habitats and ecosystems in Crown ownership and control.*

*Greater use of DOC's advocacy functions under resource management and other legislation to halt the decline of our biodiversity and enhance threatened species and their habitats.*

*Regulations are needed to require appropriate bycatch mitigation techniques, and transition to modern, low impact, fishing techniques.*

*The war on weeds needs to be expanded from just 13 of the 350 weeds known to be harmful to nature.*

## **6. Will the proposed goals help us achieve the vision and assess our progress?**

*The proposed goals need to be considerably more ambitious.*

*There are no goals to achieve enhancing all of our threatened and at risk species, or increasing knowledge about the many data deficient species so that no species are data deficient.*

*There is no goal setting out how progress will be assessed and publicly reported.*

*Goal 4 fails to set a target for assessing data deficient species*

**7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

Amend the goals to include:

- *Enhance the populations of more than 50% of our threatened species so that they are on the road to recovery by 2025,*
- *Manage all threatened species requiring conservation intervention for protection so that no species should become more threatened*
- *All threatened and conservation dependent species should be actively managed for recovery by 2030.*
- *Reduce by kill of threatened species to ensure recovery to non threatened status*
- *Select 230 data deficient species every year so that by 2030 there are no data deficient species.*

**8. Have we identified the right strategic themes?**

The following additional themes should be included:

- Uniting all Government Agencies in an “all of government” response to threatened and at risk species to ensure all native species thrive.
- Maintaining genetic diversity and creating resilience

**9. Do you agree with our top 10 actions? -**

*Yes with additions and amendments, as set out below.*

**10 Are there any other actions that should be included, and any actions that should be removed?**

*In addition to achieving the Predator Free 2025 goals and the Battle for our Birds response to maasting events,*

*Increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control.*

*Develop a portfolio of priority areas for sustained and effective predator control beyond public conservation lands.*

*Amend Action 7 to; Develop and publish a portfolio of priority areas for threatened species protection on private land.*

*Amend Action 8 to select 1000 rather than 500 of the 3000 data deficient species for assessment.*

*Amend Action 9 to ensure that national recovery planning systems are not only fit for purpose but are also timely and implemented to achieve threatened species goals.*

*Add to Action 10 the development of a system for monitoring and regular public reporting on progress towards the goals.*

*Introduce regulations to achieve zero bycatch of threatened species in fisheries.*

*Expand the War on Weeds to include lupins, broom and willow on river beds and their margins*

*Add an action to identify and take opportunities to preferably purchase, or covenant habitats of threatened species.*

**11. Have we identified the right number of priority species?**

(Circle or highlight one)      • Too many      • About right

• Too few

**Comments:**

*The number of threatened species identified needs to be driven by what is actually required to safe guard our threatened species and ensure that their populations are resilient and thriving rather than fitting the prioritisation to the current lack funding.*

**12. Have we identified the right priority species? No**

*All the threatened species and those that are at risk and conservation dependent should be prioritised for enhancement by 2030*

**13. Do you think other species should be prioritised ahead of the ones listed?**

**And why?**

*Prioritisation should be dependent upon threat status, with account taken of the imminence of threats and be less influenced by the cost of management.*

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

*The overall framework is seriously lacking in ambition.*

*The vision, and consequent framework only proposes to increase the populations of 150 out of 800 threatened species at risk of extinction, and manage 600 out of a further 2,200 species at risk of decline. The vast majority of threatened and at risk populations which need help now are not covered by the Strategy's proposals for action.*

*The strategy focuses on terrestrial species, relying heavily on Predator Free NZ, Battle for our Birds and the limited War on weeds. There is a disappointing lack of focus on out shore and seabirds which are also facing significant threats or marine and freshwater species generally.*

*It fails to commit all government agencies to do their bit to meet the strategy's goals, especially for marine species, or commit the government to ensure that all of the public conservation lands needing predator control are under regular sustained predator control, and that there are effective policies and actions to protect threatened species on private land.*





## By email

31 July 2017

File Reference: BIOD-3-501

Threatened Species Strategy  
 Department of Conservation  
 PO Box 10420  
 Wellington 6143

### GWRC submission on the draft New Zealand’s Threatened Species Strategy

Thank you for the opportunity to submit on the draft *New Zealand’s Threatened Species Strategy* (the draft Strategy). Greater Wellington Regional Council (GWRC) welcomes the chance to comment on how the New Zealand Government plans to work with communities to halt the decline in our threatened species and restore them to healthy populations.

Building on existing commitments and programmes, the draft Strategy identifies further steps to take to restore those species already at risk of extinction, and to prevent others from becoming threatened. This is a worthwhile goal, but one that could be better facilitated through some targeted amendments.

Given its importance to the success of threatened species conservation, we suggest that more details are needed in the draft Strategy on how ‘working in partnership’ will be implemented. It is especially important to detail how the essential partnerships between central government, iwi and others, including GWRC, will be realised.

The draft Strategy could also do more to show the linkages between the vision, goals and actions, and provide more details on specific responsibilities for delivery. We suggest that the goals should be reworked to provide specific measurable outcomes rather than detail the actions that are needed to achieve them. We think that integrating Te Ao Māori and mātauranga Māori is an overarching principle that will help to achieve the vision, not a specific goal.

We suggest that the next step following on from the draft Strategy should be to develop an implementation plan which sets out the specifics of delivery, and that essential partners such as GWRC should be involved in developing this plan.



## Background

GWRC does not actively manage threatened species. However our biodiversity management activities maintain and enhance habitats and ecosystems and therefore we have a direct role in helping to maintain and restore the threatened native species they support. GWRC will therefore be an important partner in implementing the draft Strategy in the Wellington region.

We have a statutory role to manage biodiversity through regulating resource use and through our operations. We actively protect and manage biodiversity within the Wellington region. To do this we work with stakeholders and partners including private landowners, iwi, territorial authorities, DOC and other government agencies, the QEII National Trust and other non-government organisations.

This work includes our Key Native Ecosystem programme which protects and restores high value sites for biodiversity across over 48,000ha of our region. Other GWRC programmes aim to restore riparian vegetation, improve fish passage, enhance wetland habitat, and promote legal protection of valued sites. We believe that programmes like these play a crucial role in protecting our threatened species and we are keen to support any efforts to tie these programmes into a more coordinated national strategy.

We have responded below to questions provided in the submission response document.

### **1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

The vision could better articulate the desired future state of threatened species in New Zealand. The vision currently sets out what work is needed to achieve a desirable outcome, rather than what outcome is desired. In particular it could state that part of the vision involves organisations effectively working together to achieve the strategy goals, rather than that everyone has a responsibility and role to play.

The vision of the draft Strategy appears to be focused on what will be achieved by 2025. This makes it hard to have a very compelling vision as achieving any meaningful improvements in the conservation status of threatened species is difficult, or unlikely, within this timeframe. We suggest that to provide a more inspiring vision the draft Strategy could align its goals with the dates of Predator Free 2050 (PF2050), and have a more ambitious vision for 2050.

In the vision's first line the term 'vulnerable threatened species' is used. This is confusing as one threat classification is 'nationally vulnerable'. We suggest changing this wording to avoid confusion.



## **2: Are there additional aspects that you think should be included in the vision?**

A clearer idea of what success will look like is needed to support the vision. For example, ‘a decrease in the number of species classed as threatened’, or ‘healthier populations of native species’ rather than increasing the number of threatened species we are working on. Increasing the number of species we are working on is not enough unless that management results in benefit to those species. A compelling vision would be one in which real and measurable progress is achieved (eg, species that are currently classified as threatened are no longer classified as threatened by the year X).

## **3: Do you agree with the characterisation of the value and current state of our native species?**

The values of threatened species and the reasons for wanting to enhance their populations could be made more clearly and simply. Points that could be included are:

- The uniqueness of most threatened species (it is mostly endemic rather than native species that are most at risk)
- The value of many of these threatened species to our history and sense of national identity
- The revenue generated from selling the experience of these species to tourists
- The contribution of some of these threatened species to other important ecosystem services (eg, pollination for certain other species, sources of food etc).

## **4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

Items mentioned under the ‘right tools for the job’ section mainly explain what has happened to date. It would be useful to explain what role each will play to inform work going forward. For example it would be useful to know how DOC plans to incorporate their natural heritage prioritisation tools with current methods used by GWRC and other organisations to prioritise their conservation work. It would also be valuable to know how recovery planning will be actioned for the priority list of 150 species (eg, will all species identified have action plans which can be used to coordinate conservation effort?).

## **5: Are there other tools we could use to help us achieve the vision?**

‘Working in partnership’ should be included as an additional tool. Strategic planning, cooperation and coordination between different agencies and organisations are vital tools needed to ensure the success of the draft Strategy. Details on how these partnerships will work should be included. We suggest that ‘a partnership with the Botanic Gardens Australia and New Zealand’ should be included as an example of a partnership, rather than as a tool in itself.

We support the strategic theme of managing ecosystems at a scale to protect species. However ecosystem restoration is not mentioned as a tool for achieving the draft Strategy’s vision. Ecosystem restoration



involves more than controlling predators and invasive weeds and is a key driver of GWRC's biodiversity management activities.

Fenced sanctuaries are mentioned as a tool but using islands as a tool for conserving threatened species is not. Both should be included.

**6: Will the proposed goals help us achieve the vision and assess our progress?**

To 'manage 500 species for protection' is not a clear goal. It is an action which will be undertaken to achieve a goal. Goals need to be measurable towards achieving the vision. To 'manage 500 species for protection' does not specify if the management is sufficient to safeguard vulnerable threatened species. Similarly, the second goal does not specify if the populations of 150 prioritised species have been 'enhanced' in a meaningful way. The success of greater numbers of individuals, wider geographic range and genetic metapopulation management need to be measured against the international Red List criteria that have been developed for this purpose. A clear goal would therefore be to prevent X number of species from becoming more threatened and improve the threat status of Y number of species by given dates.

The Strategy needs to describe how the goal of integrating Te Ao Māori and mātauranga Māori into species recovery work will be achieved. We believe that integrating Te Ao Māori and mātauranga Māori is a vital part of delivering threatened species conservation rather than an outcome or a measure of how well we are delivering the vision of the draft Strategy. As such, it may be better described as an integral overarching principle which will help achieve the vision, rather than a goal.

To indicate that the Government is fully committed to achieving the goal we suggest that words like 'drive' or 'lead' research would be better than 'support' research as part of goal four.

**7: Are there alternative goals that you think will better achieve the vision and assess our progress?**

See answers to question 6 above.

**8: Have we identified the right strategic themes?**

The discussion around the theme 'focusing beyond public conservation land' mentions the work of the Queen Elizabeth II (QEII) National Trust but fails to recognise the successful conservation work already being undertaken by organisations such as GWRC on private land and outside the conservation estate. We would like clarification if the shift in focus to beyond public conservation land will be directed and undertaken by DOC, with more funds being made available to that end, or if organisations such as GWRC will be expected to expand their current conservation efforts on private land.

It would be useful to articulate how the theme 'working together in partnerships' will be implemented. The theme should include specifics that partner organisations can work towards. The partnerships between





statutory agencies such as GWRC (those who receive tax payer or rate payer funding particularly) and iwi are especially important.

**9: Do you agree with our top 10 actions?**

We agree that the top 10 actions are all important for achieving threatened species goals. However, the actions are a reiteration of work that is already under way. We suggest that clear links should be established between the top actions, the preceding sections, and the draft Strategy goals.

The action to identify and publish threatened species ‘hotspots’ will be particularly useful to help further integrate threatened species conservation into the biodiversity work already undertaken by GWRC. More detail is needed on how this hotspot information could be most efficiently used in a coordinated way by partner organisations.

**10: Are there any other actions that should be included, and any actions that should be removed?**

An action could describe the coordination and strategic partnerships between agencies and organisations involved in threatened species conservation work. As mentioned in the ‘right tools for the job’ this is an integral part of ensuring that the goals of the draft Strategy are successfully delivered.

**14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

It is not currently clear how all of the different sections of the draft Strategy fit together. It is also not clear how the Government intends the document to be used. The draft Strategy identifies five themes, four goals and ten priority actions plus identified ‘tools for the job’ and ‘foundations for recovery’. We recommend that the relationships between these be clearly stated. A clear ‘wiring diagram’ showing how the draft Strategy’s purpose, vision, focus and goals are linked with items detailed in the ‘a call to action’, ‘the plan for attack’ and ‘we can win this’ sections would be very useful.

The document is front loaded with *Predator Free 2050* (PF2050) before explaining the purpose of the draft Strategy. This confuses the draft Strategy as PF2050 is only one of the ‘foundations for recovery’ and top 10 actions. As such, the draft Strategy appears to be focused on how to deliver PF2050 rather than how this tool for recovery will help achieve threatened species conservation goals.

**15: Do you have any further comments regarding the draft Strategy that is not covered above?**

We request that more clarity is given on how this document could be used in a strategic way by all organisations and agencies involved in conservation and biodiversity work to enable us to successfully achieve the vision. The draft Strategy states that support and contributions through partnerships with regional councils, plus others, will be essential and that clear species goals and the prioritised list of species



set out in the draft Strategy will guide decisions by local councils in their biodiversity work. However it does not clearly explain how these partnerships will be realised and this is a key to success.

We suggest that the next step following the draft Strategy should be to develop an implementation plan. Essential partners such as GWRC should be involved in developing this plan. This implementation plan could include specifics for the 'tools for recovery' and 'top ten actions' such as Predator Free 2050, to provide a comprehensive picture of where conservation effort will be focused to 2025, and beyond.

Thank you again for the opportunity to comment on the draft Threatened Species Strategy.

Yours sincerely,

[Redacted signature block]

[Redacted name]

Catchment Management Group, Greater Wellington Regional Council

[Redacted contact information]



# New Zealand's Threatened Species Strategy: submissions for consultation

#139

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter or contact person:	[REDACTED]
Organisation name: <i>(if on behalf of an organisation)</i>	Dunedin Branch, Royal Forest and Bird Protection Society of NZ
Email:	[REDACTED]
Signature: <i>(we accept a typed signature if no electronic signature)</i>	[REDACTED]

## Submission:

You can answer all or some of the questions.

### 1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

*No – This vision lacks ambition when it comes to protecting our threatened and at risk native species. It needs to honour New Zealand’s international commitments;*

*To restore viable populations of all our threatened and at risk species across their natural range and maintain their genetic biodiversity.*

*This could be encapsulated by a vision based on that recommended by the Parliamentary Commissioner for the Environment’s recent Report on the state of our native birds.*

*“The restoration of abundant, resilient and diverse species and habitats across their natural range.”*

*To achieve this, the Strategy’s vision needs to be much more ambitious than just aiming to safeguard 20% of our threatened species by 2030. Like Predator Free New Zealand it needs to aim high and look to safeguard all our threatened species by setting clear goals for significant increases in the number of threatened species that will be actively managed for their restoration; i.e.:*

- *All threatened and at risk species will be protected, not just 20% of them, and*
- *All threatened and at risk species that are conservation dependent will be under intensive management setting them on a path to recovery.*

*The vision for Predator Free NZ by 2050 – is supported.. This needs to be expanded to include the other key introduced predators, especially mice, ferrets, weasels and feral cats.*

*“Battle for our Birds” is supported but needs to be expanded so that all of the public conservation land needing predator control is under regular sustained predator control. We calculate that this would only cost around \$50 million a year (based on roughly 7million ha receiving control once every 3 years with an average cost of \$7 per ha).*

*Until we have eradicated all introduced predators we need to make sure that our threatened species survive and no more species become threatened. To do this we will also need comprehensive, landscape – scale, predator control on land outside of the conservation estate.*

*The “War on Weeds” also needs to be expanded from the dirty dozen as this is less than 4% of the 350 weeds which currently threaten nature. Weeds such as lupin, broom, poplar and gorse are urgently in need of control in some habitats where there are many threatened species such as braided river beds and lowland dryland sites.*

**2. Are there additional aspects that you think should be included in the vision?**

*The vision should address:*

- *the need to halt the loss of habitats that support threatened species*
- *Increased emphasis on improving our knowledge of the threats to, and conservation status of, species.*
- *Actions for threatened marine species.*

*The vision is focused on land based threatened species and actions to assist them, yet there are large numbers of sea birds threatened with extinction as well as dolphins, whales, sea lions, marine fish and invertebrates.*

***Responsibility for our native species lies not just with DOC, but also with MPI, LINZ, and MBIE. and these agencies are frequently guilty of enabling the demise of our native plants and wildlife. The need to bring all of Government on board is recognised in the Strategy, but there is no commitment to ensuring that all agencies and territorial authorities will have to implement the strategy. All government agencies should have a responsibility under the Strategy to ensure that their policies and actions support the restoration of threatened and at risk species.***

**3. Do you agree with the characterisation of the value and current state of our native species?**

*Yes we agree with the value of our biodiversity.*

*The Trouble in Paradise section of the strategy needs to recognise the impact of the commercial harvest of threatened species, such as whitebait species and Long finned eels, and the continued clearance of habitats of threatened species for commercial development such as farming intensification, urban expansion and infrastructure such as motorways.*

*The state of our species section needs to be more specific so that it is clear that for example what percentage of our birds, or reptiles, are threatened, and what the trends are for each group of species.*

**4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

*The Strategy needs to require that all critically threatened species that would benefit from detailed management plans also have dedicated recovery groups that oversee the production and implementation of those plans.*

*The Strategy places too much emphasis on the need to prioritise the work between threatened species. This emphasis appears to be driven by the lack of resources, rather than conservation need. All threatened and conservation dependent species need to be managed for protection and there needs to be flexibility to be able to work on species that may not have been prioritised, but where an opportunity or a necessity arises.*

*Captive management should only ever be a last resort tool, as the priority for threatened species must be conservation in situ.*

*While Fenced sanctuaries serve a useful purpose, they should not be prioritised over conservation of threatened species in situ.*

*As the Parliamentary Commissioner for the Environment's recent report notes, translocations are expensive and risky and should be evaluated against the overall benefit of the species and against the benefit of using the same resources to control predators, or to provide other assistance in the in situ restoration of threatened species.*

*The development of native threatened plant and habitat protection legislation is supported..*

*Support the adoption of a comprehensive National Policy Statement on Indigenous Biodiversity under the RMA.*

*Support greater use of legislation, regulation and policies to ensure that human actions do not further threaten species, for example zero bycatch of threatened species in the fishing industry, no clearance of threatened species habitats.*

*Development of a National Policy Statement on indigenous biodiversity is supported provided it sets bottom lines for biodiversity protection on private land, that will achieve the vision and the goals needed to protect and enhance all our Threatened and At Risk native species and prevent others becoming threatened.*

## **5. Are there other tools we could use to help us achieve the vision?**

*The best possible tool is to ensure that the Department of Conservation is adequately funded to undertake all the steps necessary to restore all species at risk of extinction and to prevent others from becoming threatened.*

*The government needs to also adequately resource science to identify the threats and agents of decline and develop management prescriptions*

*Tools and resources are needed to ensure the monitoring and enforcement of existing legislation, policies and regulations at the central and regional and local government levels.*

*Utilise the Crown's tenure review process to secure high country threatened species habitats and ecosystems in Crown ownership and control.*

*Greater use of DOC's advocacy functions under resource management and other legislation to halt the decline of our biodiversity and enhance threatened species and their habitats.*

*Regulations are urgently needed to require appropriate bycatch mitigation techniques, and transition to modern, low impact, fishing techniques.*

*The war on weeds needs to be expanded from just 13 of the 350 weeds known to be harmful to nature.*

## **6. Will the proposed goals help us achieve the vision and assess our progress?**

*The proposed goals need to be considerably more ambitious.*

*There are no goals to achieve enhancing all of our threatened and at risk species, or increasing knowledge about the many data deficient species so that no species are data deficient.*

*There is no goal setting out how progress will be assessed and publicly reported.*

*Goal 4 fails to set a target for assessing data deficient species*

## **7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

Amend the goals to include:

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- *All threatened and conservation dependent species should be actively managed for recovery by 2030.*
- *Reduce by-kill of threatened species to ensure recovery to non threatened status*
- *Select 230 data deficient species every year so that by 2030 there are no data deficient species.*

## **8. Have we identified the right strategic themes?**

The following additional themes should be included:

- *Uniting all Government Agencies in an “all of government” response to threatened and at risk species to ensure all native species thrive.*
- *Maintaining genetic diversity and creating resilience*

## **9. Do you agree with our top 10 actions? -**

*Yes with additions and amendments, as set out below.*

**10 Are there any other actions that should be included, and any actions that should be removed?**

*In addition to achieving the Predator Free 2025 goals and the Battle for our Birds response to maasting events,*

*Increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control.*

*Develop a portfolio of priority areas for sustained and effective predator control beyond public conservation lands.*

**Amend Action 7** to; *Develop and publish a portfolio of priority areas for threatened species protection on private land.*

**Amend Action 8** to select 1000 rather than 500 of the 3000 data deficient species for assessment.

**NB Budget cuts have forced the Department of Conservation to target only 150 species for population growth, when there are 800 species that are in very serious trouble. Forty of the 150 species are found in Otago but that does not imply that they will be conserved there. Several species that are special to Otago are not listed such as the Otago shag and the coastal *Lepidium crassum*. Only one of the species endemic to the limestone of the lowland Lower Waitaki made the list, of the ten that have a threatened status.**

**However it is heartening to see that the extraordinary diversity of Galaxid fish in Otago catchments is recognised. This is certainly a group that is facing further decline in the face of agricultural intensification, pollution, climate change and predation by trout.**

**Amend Action 9** to ensure that national recovery planning systems are not only fit for purpose but are also timely and implemented to achieve threatened species goals.

**Add to Action 10** the development of a system for monitoring and regular public reporting on progress towards the goals.

*Introduce regulations to achieve zero bycatch of threatened species in fisheries and make the reporting of bycatch readily available to the public.*

*Expand the War on Weeds to include lupins, broom and willow on river beds and their margins before we lose the black stilts, wrybills and banded dotterels that live on the braided river beds.*



*Add an action to identify and take opportunities to preferably purchase, or covenant habitats of threatened species.*

**11. Have we identified the right number of priority species?**

(Circle or highlight one) • Too many • About right

• **Too few**

**Comments:**

*The number of threatened species identified needs to be driven by what is actually required to safeguard our threatened species and ensure that their populations are resilient and thriving rather than fitting the prioritisation to the current lack of funding.*

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*All the threatened species and those that are at risk and conservation dependent should be prioritised for enhancement by 2030*

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**And why?**

*Prioritisation should be dependent upon threat status, with account taken of the imminence of threats and be less influenced by the cost of management.*

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

*The overall framework is seriously lacking in ambition.*

*The vision, and consequent framework only proposes to increase the populations of 150 out of 800 threatened species at risk of extinction, and manage 600 out of a further 2,200 species at risk of decline. The vast majority of threatened and at risk populations which need help now are not covered by the Strategy's proposals for action.*

*The strategy focuses on terrestrial species, relying heavily on Predator Free NZ, Battle for our Birds and the limited War on weeds. There is a disappointing lack of focus on out shore and seabirds which are also facing significant threats or marine and freshwater species generally.*

*It fails to commit all government agencies to do their bit to meet the strategy's goals, especially for marine species, or commit the government to ensure that all of the public conservation lands needing predator control are under regular sustained predator control, and that there are effective policies and actions to protect threatened species on private land.*

# New Zealand's Threatened Species Strategy: submissions for consultation

#140

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### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
(if on behalf of an organisation)

Email:

Signature:

*(we accept a typed signature if  
no electronic signature)*



## Submission:

This submission is made on behalf of the Freshwater & Estuaries National Centre, NIWA. It has been reviewed by Dr John Quinn, Chief Scientist - Freshwater & Estuaries and approved for release by Dr Bryce Cooper, General Manager – Strategy.

NIWA makes this submission in accordance with its obligations under its Statement of Core Purpose, specifically: providing scientific knowledge that enhances the stewardship of New Zealand's freshwater ecosystems and biodiversity; fulfilling its responsibilities as the lead science agency with respect to aquatic biodiversity and biosecurity; and, providing advice on matters of its expertise to the Crown.

## You can answer all or some of the questions.

*1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?*

Partially.

In general, NIWA supports the proposed Threatened Species Strategy because, if implemented, it will make significant progress towards achieving the policy intent of safeguarding our vulnerable threatened species. We agree with the assertion that achieving the intent of the Strategy will require not only DOC but all New Zealanders and especially a partnership with iwi who are kaitiaki of our biota.

However, The Strategy could be strengthened by:

- Recognising that the main pressure for most threatened species, habitat loss, is still occurring, albeit outside of the Conservation Estate.
- Better recognising the threats to aquatic species. The section “Trouble in Paradise” does consider threats to aquatic species but actions to remedy many of these threats are lacking. Freshwater habitats and their biota are amongst the most threatened ecosystems, both globally and within New Zealand (Gerbeaux et al., 2016).

*2: Are there additional aspects that you think should be included in the vision?*

*3: Do you agree with the characterisation of the value and current state of our native species?*

The section describes the current state of New Zealand's biota with 3,000 native species classified as 'threatened' or 'at risk', with around 800 of these in the nationally threatened classes.

However, the statistics produced do not adequately represent the situation in our freshwaters. The percentage of threatened freshwater taxa are disproportionately

high. Data for freshwater fish and invertebrates are presented in the proposed Strategy document. In the case of freshwater-dependant birds there are a total of 36 indigenous species (218 total number of indigenous bird species). Of these 11 are nationally threatened (64 total), 5 are declining (22 total) but only 2 taxa are recovering or relict (38 total). In the case of freshwater-dependant plants, these species (80 taxa) comprise ~30% of nationally threatened vascular plant taxa, with an additional 26 at-risk declining taxa. There are no recovering freshwater-dependant plant taxa and only two classed as relict (Gerbeaux et al. 2016).

In summary, freshwater taxa are over represented in nationally threatened and at-risk declining categories and there are few examples of successful recovery following conservation effort. The lack of success is seen as a consequence of not addressing the right conservation issues, as opposed to the drivers of these declines being intractable.

*4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?*

The tools outlined in this section cover off on recovery, taxa prioritisation and triage measures such as seed banking, fenced sanctuaries and captive management, prevention strategies through border biosecurity, but do not emphasise the research needs to develop new, and refine existing, control tools and pest management strategies to actively protect threatened taxa from introduced predators, browsers or competition from invasive plants. The only exceptions are the use of 1080 (mammalian pest management) and biocontrol. Biocontrol alone is unlikely to protect most species from ongoing decline. A wider range of tools are required in the Strategy to control introduced predators, browsers and invasive plants.

*5: Are there other tools we could use to help us achieve the vision?*

The concept of fenced sanctuaries has not been extended to freshwater bodies. Even within the Conservation Estate, water bodies continue to be invaded by alien pests (e.g., lagarosiphon oxygen weed and the pest fish rudd in Lake lanthe). We recommend further exploration of this and similar threatened species management tools developed for terrestrial systems and their application to management of freshwater threatened species. Catchments and water bodies (particularly lakes, wetlands and aquifers) are often wholly or partially isolated from each other and can be managed proactively as islands in a sea of land, by biosecurity management of incursions and management of land use activities within a catchment and inter-basin and intra-basin water transfers.

*6: Will the proposed goals help us achieve the vision and assess our progress?*

Only partially. These goals will continue to protect a number of threatened terrestrial biota (especially vertebrates), but more effort is required for those other groups where decline is continuing, including plant and invertebrate taxa.

*7: Are there alternative goals that you think will better achieve the vision and assess our progress?*

*8: Have we identified the right strategic themes?*

The four goals for threatened species certainly provides focus and a sense of urgency and broadly the strategic themes are appropriate. As discussed under Question 5, a holistic, whole ecosystem approach to freshwater management needs to mirror terrestrial 'landscape scale' initiatives.

*9: Do you agree with our top 10 actions?*

The top 10 actions are appropriate. See specific comments on three actions below:

#2) The predator-free initiative should extend to non-mammalian predators. In the case of freshwater fauna, predatory introduced fish have an equally catastrophic impact as mammalian predators do on terrestrial fauna.

#4) It is appropriate to further investigate the conservation needs and prioritisation of plant species. Seed banking is unlikely to be a successful strategy for all species so propagation, translocation and other tools identified in the Strategy will be required.

#6) Freshwater reforms, through the National Policy Statement for Freshwater Management, will ensure better protection of water quality and quantity, which may improve habitat for some threatened freshwater-dependant biota. However, many freshwater conservation projects have failed because they have not dealt with the transformative effects of invasive species. Introduced pests are considered second only to habitat loss as the drivers of biodiversity decline in freshwaters globally and can act independently of other stressors such as eutrophication. Submerged weeds and some introduced fish radically transform aquatic systems, contributing to declining water quality, loss of native biodiversity and threaten the survival of many endangered biota.

*10: Are there any other actions that should be included, and any actions that should be removed?*

A number of threatened freshwater fauna are migratory and human structures such as dams and culverts may prevent critical stages of their life cycle. The Strategy should acknowledge the role of the New Zealand Fish Passage Advisory Group (<http://www.doc.govt.nz/nature/habitats/freshwater/fish-passage-management/advisory-group/>) and their aim to communicate, promote, and advocate for improved technical guidance and policy to support fish passage and connectivity of our waterways. Conversely, non-migratory species are currently protected in

areas where these obstructions prevent the access of introduced predators (akin to fenced sanctuaries).

Several of our threatened and at-risk fish species are subject to commercial harvest. For example, the Parliamentary Commissioner for the Environment has reviewed the status of longfin eel (proposed as a notable species in the Strategy) and made several recommendations to both Ministry for Primary Industries and DOC (<http://www.pce.parliament.nz/media/1039/longfin-eels-update-report-web2.pdf>). An action to review harvest of threatened species warrants inclusion as an action in the Strategy.

11: *Have we identified the right number of priority species?*

(Circle or highlight one) • Too many • **About right** • Too few

### Comments:

12: *Have we identified the right priority species?*

The identification of 50 notable and an additional 100 taxa seems to be a very sensible approach. Notable biota are really the flagship species and we agree with their selection. Perhaps iconic threatened species such as kotuku and southern crested grebe and the at-risk tāonga species inānga and kākahi should be considered for inclusion.

We are uncomfortable with the methodology used to select the remaining 100 taxa. As only conservation dependant taxa were used in this exercise, there is already a pre-determination of which biota are prioritised, that overrides the algorithm approach.

Conservation dependence is not universally applied across taxa. For example 26 of the 80 nationally threatened bird species are conservation dependant (but only 3 of the 36 freshwater-dependant birds species are), whereas only 7 of 21 threatened fish are conservation dependant and only 81 of 289 nationally threatened vascular plant taxa are conservation dependant.

Perhaps an application of the Threatened Species Strategy algorithm should be applied to all taxa independent of conservation dependence to ascertain if this has an overriding influence on taxa selection. Of course, there are likely to be species where effective conservation actions are not yet apparent but this could form the focus of future research.

13: *Do you think other species should be prioritised ahead of the ones listed? And why?*

See above

*14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?*

The overall intent and most of the components outlined in the draft Strategy are appropriate to safeguarding our threatened species. However, more effort needs to be made to incorporate groups of taxa that continue to decline, as they do not currently receive effective conservation action.

*15: Do you have any further comments regarding the draft Strategy that is not covered above?*

NIWA continues to develop a range of tools for improving water quality, restoring aquatic habitat, and controlling biosecurity threats that, if implemented, would help advance the aims of the Threatened Species Strategy with respect to freshwaters. NIWA is eager to collaborate with DOC, other agencies and communities to ensure that these science-based solutions are indeed used to reverse the ongoing decline in freshwater-dependant species.

Reference:

Gerbeaux, P, Champion, P, & Dunn, N 2016. Conservation of freshwaters. In Jellyman, PG, Davie, TJA, Pearson, CP, & Harding, JS (Eds), *Advances in freshwater research*. New Zealand Freshwater Sciences Society & New Zealand Hydrological Society.



31 July 2017

Department of Conservation  
PO Box 10 420  
WELLINGTON 6143  
threatenedspeciesstrategy@doc.govt.nz

**SUBMISSION: New Zealand's Threatened Species Strategy – draft**

To whom it may concern

Thank you for the opportunity to comment on the draft, and for providing me with a hard copy of it.

If hearings are held, I would like to speak in support of my submission.

**INTRODUCTION**

**Quality of draft**

I consider that the production of the draft, with widespread use of colour illustrations, high quality paper, and extensive areas of 'white space', to be an unnecessary expenditure of staff time and resources. I believe that such a standard is appropriate only for the final document.

I find that paragraph headings in red type face, e.g., on page 18, do not provide sufficient contrast with the white of the paper.

**Use of "Spotlights"**

The use of "Spotlights" is helpful. Unfortunately, of the eighteen "Spotlights", only six feature plants. Of those, three feature weeds, two feature diseases affecting native plants, and only one features a native plant. This gross imbalance favouring our fauna over our flora, upon which our fauna are dependant, should be rectified in the final document.

The use of colour illustrations elsewhere in the document is also imbalanced. Five, including the cover, and the Minister's statement, feature fauna, while three feature indigenous plant communities.

I recommend that these biases in favour of fauna be reversed in the final document, thus indicating that it is the indigenous plant communities which are crucial support for our indigenous fauna.

Pages 2 and 3

Predator-Free 2050 - the springboard for protecting threatened species



This timely and welcome initiative could be greatly assisted if Predator-Free NZ Ltd were to provide essential funds for Professor John Knight's (University of Otago) and his son, Professor Rob Knight's (working in the USA), to continue their research into the potential for the use of 'gene drive' as a means of predator control. This method would use gene manipulation to seek to produce all-male offspring in a pest animal, e.g., rats. If research indicates the potential for the method, large numbers of males would be captive-bred for release into the wild for landscape-scale tests. Predator-Free NZ Ltd would be the ideal agency to fund and assess the potential of this predator-control opportunity for the conservation of our indigenous flora and fauna.

#### Page 4: The Strategy

**Purpose:** I support this paragraph, and recommend that the word 'indigenous' be inserted in line 2, between the words 'threatened' and 'species'.

**Vision:** This is not a vision statement. I recommend that the draft statement be re-worded: "The Threatened Species Strategy has enabled our vulnerable threatened species to flourish in the wild, and has reduced the numbers of threatened and at risk species."

I recommend that the second paragraph in the draft vision be titled "**Initiatives**".

I recommend that the third paragraph in the draft vision be titled "**Partnerships**".

#### Page 5: Goals

1. What criteria were used to choose the 500 and 600 species? Provide a cross-reference to page 28.
2. What criteria were used to prioritise the 150 threatened and at risk species? Provide a cross-reference to page 28.
3. Does this integration have to take as long as eight years?
4. I support this goal.

#### Page 8: Our unique New Zealand

In the third paragraph, line 4, add 'flora and' before 'wildlife'. Reason: Our flora is essential support for our wildlife.

#### Page 10: Trouble in paradise

In paragraph 3, line 3, add 'mice, weasels, ferrets, hedgehogs, magpies, rooks, wasps'.

In paragraph 4, line 2, add 'hares, thar, Canada geese, mallards, black swans'.

In paragraph 5, mention native plants which are invasive outside their natural range, e.g., in the Wellington area: *Corynocarpus laevigatus*, *Hoheria populnea*, *Pittosporum crassifolium*, *P. ralphii*.

#### Page 18: National Science Challenges

Paragraph 3 fails to mention research into ‘gene drive’, a process which could ultimately involve all animals in a population of predators, e.g., rats, stoats, possums, producing only male offspring. The result has the potential to lead to a steady decline, and eventual extinction, of the pest species. Professor John Knight, University of Otago, and his son, Professor Rob Knight, working in the USA, have made numerous applications for funding to continue their research into this promising technology, but have not received the essential grant money from government sources for long enough to enable completion of their work, followed by field testing.

#### Page 21: Fenced sanctuaries

Fenced sanctuaries, which require ceaseless large investments in staff time, and the efforts of volunteers, are a stop-gap measure while pest-animal control methods are found, e.g., ‘gene drive’, which may offer the hope of eventual elimination of pest-animal species.

#### Page 22-23: Biocontrols

No mention is made of the potential to use ‘gene drive’ to control mammalian pests. Please see my comments about page 18 above.

#### Page 25: Regulation

Paragraph 3 makes no mention of DOC acting to seek draft legislation providing fully effective protection to native plants and fungi. This work should be a top priority for the department.

#### Page 29: Setting goals

1. The explanatory paragraph for this goal fails to mention the potential for ‘gene drive’ technology to help with landscape-based predator control, together with Predator-Free 2050 and War on Weeds;
2. This goal would be acceptable if a fair balance of threatened and at risk populations of flora and fauna species are to be enhanced in their natural habitats;
3. This goal involves waiting for eight years before it is achieved. Surely it can be achieved more rapidly;
4. I support this goal.

#### Page 31: 150 priority species

Paragraph 2 infers that the list will be weighted in favour of “delivering on what is important to people”. Thus priority will probably be given to fauna over flora, despite our flora’s crucial role in supporting our fauna.

#### Paragraph 5: How the list was made

This paragraph starts by stating “ ... we first identified 50 species that are notable to New Zealanders”. This approach is likely to have produced a list predominantly of species of fauna, rather than a balance between species of flora and fauna.

#### Page 32: Strategic themes

Paragraph 3 should mention the potential of ‘gene drive’ technology to be part of our efforts at landscape-scale destruction of pest animals.

Paragraph 4 should mention the possibility of ZIP (Zero Invasive Predators Ltd) testing 'gene drive' technology in the field, once research has been funded to enable its completion.

Page 35: Science leading the way

Paragraph 4. I trust that the national partnership in research innovation will include funding for research into the potential for 'gene drive' as a means of landscape-scale elimination of pest animals over time.

Page 39: Working together in partnerships

Paragraph 5, lines 1 and 2 should be rewritten to read: "By tapping into our love for our native flora and wildlife".

Paragraph 6. The first sentence could include 'gene drive' as a potential focus for research.

Page 40: Top 10 actions

1. Achieve the Predator-Free 2025 goals including:

Give example(s) of sites totalling 1 million additional hectares of predator control.

Give example(s) of sites totalling at least 20,000 hectares from which predators might be eradicated.

Cite 'gene drive' as having the potential to eventually eliminate at least one mammalian predator.

2. Continue to invest in improving tools and technologies for predator control by:

Cite 'gene drive' as having the potential to eventually eliminate at least one mammal predator.

7. Identify and publish threatened species 'hotspots' both on and off public conservation land to identify the key areas and threatened species for potential protection.

Cite the risks posed to *Pseudopanax crassifolium* wherever householders have planted *Pseudopanax lessonii*. The latter hybridises with the former. The result could be the eventual elimination of *Pseudopanax crassifolium* in the wild.

Pages 42 – 44: 150 priority threatened and at risk species

Notable species

This lists forty-four species of animals and five species of plants.

100 managed and threatened and at risk species

This lists sixty-six species of animals and thirty-four species of plants.

The above figures suggest either:

- that there has been more research on our indigenous fauna than on our indigenous flora, or
- that government and the community are biased in their interest in, and affection for, our indigenous biota.

I believe that we must intensify our research into our indigenous flora, the wellbeing of which is crucial to the wellbeing of our indigenous fauna.

#### Conclusion

Fully effective and ceaseless implementation of the *Threatened Species Strategy* will require far greater financial commitment by successive governments than at present. The Department of Conservation has been grossly underfunded for decades for its crucial role in managing over 30% of New Zealand's land area. One restructuring after another has caused the loss of hundreds of staff vital to the implementation of DOC's work where it counts – in research and in the field.

Yours sincerely

██████████

My background relevant to this submission

- F.R.I. Ecological Forest Survey team member, 1958/59. and 1959/60, in North Island axial ranges;
- F.R.E.S. High Country Survey team member, 1961-62, in Cragieburn, Eyre and Takitimu mountains;
- Member, Wellington Botanical Society since 1980. Participant in many field trips, ranging from the Far North to Rakiura/Stewart Island; committee member since 1984, and compiler of newsletter since then; co-leader of many field trips;
- Assistant Conservation Officer, Royal Forest & Bird Protection Society 1980-1981;
- Secretary, Environment & Conservation Organisations of NZ (ECO), 1981-1990;
- Member, Wellington Conservation Board, 1993-98. Drafted many submissions;
- Contractor to Department of Conservation, mid-1990s, establishing 20m x 20 m permanent vegetation monitoring plots in fuchsia forest in the Tararua Range, and in kohekohe forest from Waikanae Scenic Reserve to Colonial Knob Scenic Reserve;
- Contractor to Greater Wellington Regional Council, 2002-2015. First botanical survey of the Wainuiomata and Orongorongo water collection areas; 20 m x 20 m permanent vegetation monitoring plot work; ungulate-browse line establishment and monitoring. Volunteer guide in the water collection areas.
- Co-contractor to Wellington City Council for several botanical surveys, and from 1989 to 2016, for maintenance of Makara Foreshore Reserve;
- Volunteer, Karori Wildlife Sanctuary/Zealandia, 1997-present. Tasks have included pest animal control, bird feeding, guiding botanical tours, co-writing brochure for the Botanical Trail.
- Co-writer of over seventy articles on native plants for the monthly *The Tararua Trumper*, published by the Tararua Tramping Club;
- Writer, and co-writer, of many submissions to decision-makers on conservation and environmental topics, over the last three decades;
- Member of numerous groups working on conservation and environmental matters.

**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 4:17 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
Organisation:

Email: [REDACTED]

q1: No - only aiming to protect 20% of threatened and at risk species by 2030 is a poor target:

All threatened and at risk species must be protected

The vision for Predator Free NZ by 2050 – is supported but needs to be expanded to include the other key introduced predators, especially mice, ferrets, weasels and feral cats.

“Battle for our Birds” is supported but needs to be expanded so that all of the public conservation land needing predator control is under regular cost effective sustained predator control.

The “War on Weeds” also needs to be expanded from the dirty dozen as this is less than 4% of the 350 weeds which currently threaten nature. Weeds such as lupin and broom are a serious threat to birds nesting on braided rivers.

q2: The vision should address:

- \* The need to halt the loss of habitats that support threatened species
- \* Actions for threatened marine species.

The vision is focused on land based threatened species and actions to assist them, yet there are large numbers of sea birds threatened with extinction as well as dolphins, whales, sealions, marine fish and invertebrates.

The vision and actions of the Strategy need to incorporate an all-of-government approach to protecting threatened and at risk native species. The actions (or lack of action) of many government agencies including the Department of Conservation, have significant impacts on our threatened species. All government agencies should have a responsibility under the Strategy to ensure that their policies and actions support the restoration of threatened and at risk species.

q3: Yes Agree with the value of our biodiversity.

The Trouble in Paradise section of the strategy needs to recognise the impact of the commercial harvest of threatened species, such as whitebait species, Long finned eels and seaweed, as well as the continued clearance of habitats of threatened species for commercial development such as farming intensification, urban expansion and infrastructure such as motorways.

The state of our species section needs to be more specific so that it is clear that for example what percentage of our birds, or reptiles, or native plants are threatened, and what the trends are for each group of species.

q4: ~ The Strategy needs to require that all critically threatened species that would benefit from detailed management plans also have dedicated recovery groups that oversee the production and implementation of those plans.

~ The Strategy places too much emphasis on the need to prioritise the work between threatened species. This emphasis appears to be driven by the lack of resources, rather than conservation need. All threatened and

conservation dependent species need to be managed for protection and there needs to be flexibility to be able to work on species that may not have been prioritised, but where an opportunity or a necessity arises.

~ Captive management should only ever be a last resort tool, as the priority for threatened species must be conservation in situ.

~ While Fenced sanctuaries serve a useful purpose, they should not be prioritised over conservation of threatened species in situ.

~ As the Parliamentary Commissioner for the Environment's recent report notes, translocations are expensive and risky and should be evaluated against the overall benefit of the species and against the benefit of using the same resources to control predators, or to provide other assistance in the in situ restoration of threatened species.

~ The development of native threatened plant and habitat protection legislation is supported..

~ Support the adoption of a comprehensive National Policy Statement on Indigenous Biodiversity under the RMA.

~ Support greater use of legislation, regulation and policies to ensure that human actions do not further threaten species, for example zero bycatch of threatened species in the fishing industry; no clearance of threatened species habitats.

~ Development of a National Policy Statement on indigenous biodiversity is supported provided it sets bottom lines for biodiversity protection on private land, that will achieve the vision and the goals needed to protect and enhance all our Threatened and At Risk native species and prevent others becoming threatened.

q5: The best possible tool is to ensure that the Department of Conservation is adequately funded to undertake all the steps necessary to restore all species at risk of extinction and to prevent others from becoming threatened.

The government needs to also adequately resource science to identify the threats and agents of decline and develop management prescriptions

Tools and resources are needed to ensure the monitoring and enforcement of existing legislation, policies and regulations at the central and regional and local government levels.

Utilise the Crown's tenure review process to secure high country threatened species habitats and ecosystems in Crown ownership and control.

Greater use of DOC's advocacy functions under resource management and other legislation to halt the decline of our biodiversity and enhance threatened species and their habitats.

Regulations are needed to require appropriate bycatch mitigation techniques, and transition to modern, low impact, fishing techniques.

The war on weeds needs to be expanded from just 13 of the 350 weeds known to be harmful to nature.

q6: The proposed goals need to be considerably more ambitious.

There are no goals to achieve enhancing all of our threatened and at risk species, or increasing knowledge about the many data deficient species so that no species are data deficient.

There is no goal setting out how progress will be assessed and publicly reported.

Goal 4 fails to set a target for assessing data deficient species

q7: Amend the goals to include:

\* Enhance the populations of more than 50% of our threatened species so that they are on the road to recovery by 2025,

\* Manage all threatened species requiring conservation intervention for protection so that no species should become more threatened

\* All threatened and conservation dependent species should be actively managed for recovery by 2030.

\* Reduce by-kill of threatened species to ensure recovery to non threatened status

\* Select 230 data deficient species every year so that by 2030 there are no data deficient species.

q8: The following additional themes should be included:

\* Uniting all Government Agencies in an “all of government” response to threatened and at risk species to ensure all native species thrive.

\* Maintaining genetic diversity and creating resilience

q9: Yes with additions and amendments, as set out below.

q10: In addition to achieving the Predator Free 2025 goals and the Battle for our Birds response to masting events:

~ Increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control.

~ Develop a portfolio of priority areas for sustained and effective predator control beyond public conservation lands.

~ Amend Action 7 to: Develop and publish a portfolio of priority areas for threatened species protection on private land.

~ Amend Action 8 to select 1000 rather than 500 of the 3000 data deficient species for assessment.

~ Amend Action 9 to ensure that national recovery planning systems are not only fit for purpose but are also timely and implemented to achieve threatened species goals.

~ Add to Action 10 the development of a system for monitoring and regular public reporting on progress towards the goals.

~ Introduce regulations to achieve zero bycatch of threatened species in fisheries.

~ Expand the War on Weeds to include lupins, broom and willow on river beds and their margins

~ Add an action to identify and take opportunities to preferably purchase, or covenant habitats of threatened species.

q11: too few

q11 comments: The number of threatened species identified needs to be driven by what is actually required to safeguard our threatened species and ensure that their populations are resilient and thriving rather than fitting the prioritisation to the current lack funding.

q12: No. All the threatened species and those that are at risk and conservation dependent should be prioritised for enhancement by 2030

q13: Prioritisation should be dependent upon threat status, with account taken of the imminence of threats and be less influenced by the cost of management.

q14: The overall framework is seriously lacking in ambition.

The vision, and consequent framework only proposes to increase the populations of 150 out of 800 threatened species at risk of extinction, and manage 600 out of a further 2,200 species at risk of decline. The vast majority of threatened and at risk populations which need help now are not covered by the Strategy’s proposals for action.

The strategy focuses on terrestrial species, relying heavily on Predator Free NZ, Battle for our Birds and the limited War on Weeds. There is a disappointing lack of focus on our shore and seabirds which are also facing significant threats; or marine and freshwater species generally.

It fails to commit all government agencies to do their bit to meet the strategy's goals, especially for marine species, or commit the government to ensure that all of the public conservation lands needing predator control are under regular sustained predator control, and that there are effective policies and actions to protect threatened species on private land.

q15:



# New Zealand's Threatened Species Strategy: submissions for consultation

#143

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

Contact person

[REDACTED]

[REDACTED]

Organisation name:  
(if on behalf of an organisation)

Environment Southland

Email:

[REDACTED]

[REDACTED]

[REDACTED]

*(we accept a typed signature if  
no electronic signature)*



## Submission:

You can answer all or some of the questions.

### 1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

The vision statement has the higher goal of safeguarding our vulnerable threatened species but goes on to state that only a subset of species will be worked on or managed.

Environment Southland is supportive of the higher goal to safeguard New Zealand's species but believes the strategy should make provision for how DOC intends to be involved and take leadership in the protection of the whole suite of threatened species rather than just a subset. There are many species in the Southland Region, including 76 plants, 32 birds, six reptiles, five freshwater fish and one crustacean species that are classified as at risk or threatened that are not included in the strategy. Species that have been classified by experts as threatened are at an immediate or high risk of extinction (IUCN and DOC classification criteria) and some of these species, such as the Nationally Critical Te Kakahu skink *Oligosoma tekakahu*, and the plant *Gunnera hamiltonii* Kirk could be lost by 2025 without intervention. The vision (and strategy as a whole) should detail DOC's plan to manage all threatened species.

It would be better if the vision is made to be consistent with DOC's 'Vision, purpose and outcomes' stretch goal for 2025 to manage 90% of threatened species.

Environment Southland notes that meeting the administrative and financial burden of attempting to actively manage every one of NZ's threatened species is impractical. For this reason, Environment Southland supports prioritising species/actions to maximise the impact of conservation efforts. This prioritisation should not occur at the detriment of other species that have failed to meet the cut-off at the time of publication and require some level of oversight from DOC. Rather, the prioritisation tool should be used to ensure that the full suite of species can be 'safeguarded' and protected, with the development of realistic budgets for achieving this goal.

### 2. Are there additional aspects that you think should be included in the vision?

Environment Southland supports the need for national initiatives and the collaborative approach. ES argues that DOC needs to take a strong leadership role to guide this process. DOC also, need to be seen as leading by example in

developing a programme that includes all of the species and ecosystems on their estate. This leadership role should be highlighted in the vision.

The long term survival of species depends on functioning and sustainable ecosystems. This should be acknowledged and included in the vision.

### **3. Do you agree with the characterisation of the value and current state of our native species?**

Environment Southland agrees with the high value of our native species and natural ecosystems characterised in the strategy.

The importance of a diversity of species in healthy ecosystems and the importance of ecosystems services should be expanded and highlighted.

The Strategy characterises net entanglements, ingestion of rubbish and fishing bycatch as marine threats. This section is missing some key threats such as:

- The exploitation of fish stocks which impacts fish species as well as the wider marine ecosystem and threatened species such as Yellow Eyed Penguin, Albatross species and sea lions.
- Continued exploitation of native freshwater fish species such as eels and whitebait.

### **4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

Many of the foundations identified are also valuable tools and they should be acknowledged as such.

Environment Southland is supportive of:

- Creating and implementing recovery plans for all threatened species and their ecosystems.
- Fenced sanctuaries, biocontrol, biosecurity measures, translocations and regulations.
- Captive management and the use of botanic gardens and seed banking.

### **5. Are there other tools we could use to help us achieve the vision?**

Currently the Strategy only mentions freshwater reforms that relate to improving water quality. Three commercially fished freshwater species (longfin eel, shortjaw kōkopu and giant kōkopu) are included in the 150 priority species within the strategy. A review of the regulations that govern freshwater and marine fishing of native species should also be considered. Improved management of

the trade/fishing of threatened species, especially freshwater species, has the potential to enhance threatened populations.

DOC also has a role in encouraging consistency in approaches to threatened species management as well as connecting resources and skills across regions.

**6. Will the proposed goals help us achieve the vision and assess our progress?**

Goals 1 and 2 will work in part to achieve the vision of 'safeguarding' our threatened species. Management of the full suite of threatened species is required to fully meet the vision. The Strategy highlights the importance of Predator Free 2050's ambitious goal and should consider setting similarly ambitious goals.

Goal 3 will support the vision and help assess progress.

Goal 4, in its current form, is not measureable and would be better suited as a 'tool' to achieve the Strategy's vision. The target of filling the knowledge gaps for the 500 data deficient species mentioned in the actions could be added to make this a measureable goal. This goal also excludes the other aspects of the National Science Challenges that relate to species that are not data deficient.

**7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

Goal 4 should set measureable targets (see Q6) and should not neglect other aspects of science programmes which have the ability to contribute to:

- Better management methods and techniques.
- The inclusion of research into weed control techniques.
- Sustainable fishing practices.
- Climate change science/risks.

**8. Have we identified the right strategic themes?**

Environment Southland is supportive of the strategic themes identified.

The strategic themes talk about grouping the actions, but it is unclear which of the actions relate to which theme and some actions do not appear to be related to any of the themes, for example action 5 'progress key regulatory reforms'.

## 9. Do you agree with our top 10 actions?

Environment Southland supports the top ten actions in principle but believes that greater clarity could be provided to the on how each of the 10 actions:

- relate to the strategic themes
- support the strategy's goals
- combat the threats highlighted in the 'current state' section

In terms of administering these actions it is unclear who is responsible for each of the 10 actions. It is also unclear how some of the actions relate to the foundations, tools, goals and vision. For example, Action 4 'Biosecurity 2025' is a Ministry for Primary Industries initiative that is not directly related to threatened species management. In this case, the strategy does not clarify how this external document helps meet the strategy's goals and vision.

Environment Southland supports Predator Free 2050, which is expected to have a positive impact on many of our threatened species. However consideration needs to be given to how other pest species not included in the Predator Free 2050 framework are to be treated at the strategic and actions levels. Some of the pests include feral cats and other mammalian pests such as herbivores like goats and deer. Management of these threats should be reflected by an accompanying action in the strategy.

Environment Southland supports the Battle for our Birds programme and would support the inclusion of a larger land area to 'safeguard' our vulnerable and threatened species. For example, Stewart Island/Rakiura is currently excluded from this programme despite the high number of endemic vulnerable or threatened species on the island.

Action 1 "Achieve the Predator Free 2025 goals..." includes continuation of the 'Battle for our Birds' programme. This programme is not a Predator Free 2025 goal.

Environment Southland supports the National Science Challenge initiatives.

Environment Southland supports the War on Weeds and suggests that it is included as an action in addition to its status as a foundation for recovery. Environment Southland is especially supportive of the inclusion of wilding conifers and Darwin's barberry as these pose major threats to the Southland Region.

## 10. Are there any other actions that should be included, and any actions that should be removed?

Environment Southland would like to see the inclusion of an action that prioritises research into the impact of harvesting of threatened species such as giant

kōkopu. Appropriate regulation should be considered on the basis of this research.

Action 7 should include active management of sites identified as threatened species 'hotspots'.

Actions 2 and 8 are focussed on predator control and data deficient species. These actions could be strengthened if they explicitly included mention of DOC's role in developing and supporting cutting edge genetic science such as gene drive, the Trojan female technique and genetic rescue through translocation.

**11. Have we identified the right number of priority species?**

**(Circle or highlight one)**    • ~~Too many~~    • ~~About right~~    • **Too few**

**Comments:**

The strategy notes that there are 868 threatened species (and an additional 2794 species with data deficiencies) in New Zealand. As mentioned throughout this submission, the Strategy should include reference as to how these all of these species will be managed.

A capped number of 150 threatened species identified for enhancement may not be the most suitable approach. The list should be capable of increasing the number of managed species to ensure it meets the Strategy's goals and vision (as well as DOC's stretch goals) and be flexible enough to respond to external changes.

DOC's list of priority species should be a living list subject to ongoing regular review that can actively respond to external changes for example:

- Changes to threat status due to population recovery or decline
- New scientific developments
- Regulatory reform
- Financial support

**12. Have we identified the right priority species?**

Marine and non-vascular (mosses etc.) species appear to be un/under-represented.

**13. Do you think other species should be prioritised ahead of the ones listed? And why?**

See Q11.

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

The strategy could be substantially improved by more clearly linking the various sections of the strategy. It would be useful to outline how the foundations, tools, goals and actions align with and support each other.

Almost half of the text in the Strategy falls under the 'spotlight' headings. These detail existing programmes and demonstrate DOC's important role in the protection of threatened species by providing concrete examples of successful programmes. The spotlight segments could be improved by demonstrating their linkages to the rest of the strategy. The simple addition of reflecting which goals are being achieved or which actions are in progress throughout the spotlighted programmes would demonstrate some linkages.

Partnerships with local and regional councils are referred to throughout the strategy, including in the strategic themes section, as vital for success. What these partnerships look like, a summary of what the partner roles are and how those roles contribute to DOC's vision/goals would provide some clarity to councils and other organisations about how they fit in to the Strategy.

## Draft Threatened Species Strategy

### Submission from the Dark Skies Group, Royal Astronomical Society of New Zealand

31 July 2017

Our submission is based around the five themes and relates to the effects of artificial light on the nocturnal environment.

*This Strategy is based on five themes necessary to significantly progress threatened species conservation:*

1. *Uniting against invaders on a landscape scale*
2. *Managing ecosystems at scale to protect species*
3. *Building our science and knowledge base*
4. *Focusing beyond public conservation land*
5. *Working together in partnerships.*

#### **1. Uniting against invaders on a landscape scale**

We have no comment on this theme.

#### **2. Managing ecosystems at scale to protect species**

The introduction of artificial light into the outdoor environment, especially into the nocturnal environment has the ability to disrupt functioning of ecosystems. For the past 130 years there has been little management of the delivery of light into the night environment. This has led to significant spillage of light well beyond the area intended to be lit. The source technology of this light has changed over the years with some sources being quite benign while others are known to have unintended impacts on humans and ecosystems.

The current introduction of LED technology brings with it an increased likelihood of widespread impacts because of the shortwave lengths, or blue light, contained within its output. LEDs are an inherently blue source of light which needs to be modified to convert the blue component into warmer, and safer, colours. In general blue light is associated with a daytime blue sky which provides a strong environmental signal across all species on Earth. Blue light is healthy for us during the daytime but because of our (and many species) adaption to natural light cycles it can be harmful during the naturally dark period of night. Most species have adapted in some way to secure a niche existence dependent in large part on light conditions.

With over 50% of all life on our planet having adapted to being active at night it is disappointing to find the strategy does not mention “night”, only mentions “nocturnal” in relation to kiwi in the Message from Minister Barrie, and only mentions “light” in relation to weeds.

**Some examples** of research describing ecosystem concerns related to artificial light:

*Artificial light at night alters trophic interactions of intertidal invertebrates*

[www.britishecologicalsociety.org/shining-light-coastal-light-pollution/](http://www.britishecologicalsociety.org/shining-light-coastal-light-pollution/)

[http://www.exeter.ac.uk/news/featurednews/title\\_580597\\_en.html](http://www.exeter.ac.uk/news/featurednews/title_580597_en.html)

<http://onlinelibrary.wiley.com/doi/10.1111/1365-2656.12670/abstract>



*LED lighting increases the ecological impact of light pollution irrespective of color temperature (New Zealand Research - SCION)*

<http://onlinelibrary.wiley.com/doi/10.1890/14-0468.1/epdf>

*The dark side of street lighting: impacts on moths and evidence for the disruption of nocturnal pollen transport*

<http://onlinelibrary.wiley.com/doi/10.1111/qcb.13371/full>

These are a very small sample of the type of papers which are available. Any online search using “Artificial Light at Night”, “Light Pollution” or “Scotopic light pollution” will provide a rich return.

### **3. Building our science and knowledge base**

There is a growing resource of research into the impact of artificial light on the environment both in New Zealand and around the world. The Department of Conservation should join or at least monitor this research to ensure it is managing activities on Public Conservation Lands in line with good environmental practice. Increased knowledge of, and policies relating to, the impacts of light on ecosystems would allow the Department to advocate for quality eco friendly lighting across New Zealand and for concession activities on PCL. This can occur under the structure of the recently published Conservation and Environment Science Roadmap.

*Red light has no effect on bat activity: Less disruption by changing artificial color*

[www.sciencedaily.com/releases/2017/06/170602112814.htm](http://www.sciencedaily.com/releases/2017/06/170602112814.htm)

*Green lights at night can help protect petrels and shearwaters in inhabited areas*

[www.acap.aq/en/links/14-news/latest-news/1729-green-lights-at-night-can-help-protect-petrels-and-shearwaters-in-inhabited-areas](http://www.acap.aq/en/links/14-news/latest-news/1729-green-lights-at-night-can-help-protect-petrels-and-shearwaters-in-inhabited-areas)

*Dutch island adopts bird-friendly lighting*

<https://smarcitiesworld.net/news/dutch-island-adopts-bird-friendly-lighting-1517>

### **4. Focusing beyond public conservation land**

The Department’s programme “Conservation in the city” provides an ideal framework to advocate for ecologically friendly lighting. This would assist the natural processes nature requires within an urban environment but would also help surrounding areas as the effects of artificial sky glow over cities can be detected 2 to 300 kilometres distant. See:

<https://www.nps.gov/subjects/nightskies/index.htm>

<https://www.nps.gov/subjects/nightskies/measuring.htm>

### **5. Working together in partnerships**

Working together in partnerships is a fine goal. The need is to ensure that the work is based on full understanding of issues and opportunities. The current move to LED lighting is a government level response to climate change in a bid to reduce the demand on fossil fuel generated electricity. LED

technology is relatively new, brings significant benefits in energy efficiency, but the light produced by earlier versions is known to provide unintended consequences.

Research into the consequences has prompted further development of LEDs to produce less harmful form of light but government agency guidelines have been set to ensure the use of harmful versions particularly for road and street lighting. Partnerships need to be formed across NZ Government to ensure the solutions to one issue don't create new issues elsewhere. This can be ensured through comprehensive research across disciplines especially when (nocturnal) ecosystems are being modified.

I thank you for this opportunity to submit on this topic.

[REDACTED]

FRASNZ

Dark Skies Group, Royal Astronomical Society of New Zealand

[REDACTED]

# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420  
Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter or contact person:	██████████
Organisation name: <i>(if on behalf of an organisation)</i>	<b>New Zealand Plant Conservation Network</b>
Email:	██████████
Signature: ██████████ <i>(we accept a typed signature if no electronic signature)</i>	

### Submission:

30 July 2017

NEW ZEALAND PLANT CONSERVATION NETWORK

SUBMISSION ON DRAFT THREATENED SPECIES STRATEGY

## Introduction

The New Zealand Plant Conservation Network (NZPCN) welcomes the opportunity to comment on the Draft Threatened Species Strategy (DTSS) and we commend the Department of Conservation for undertaking this initiative.

The NZPCN was established in 2003 with the vision that "*no indigenous species of plant will become extinct nor be placed at risk of extinction as a result of human action or indifference, and that the rich, diverse and unique plant life of New Zealand will be recognised, cherished and restored*".

The Network's strength is in linking plant conservation practitioners with comprehensive, accessible and accurate information to support their efforts in promoting and conserving native plants. It is worth noting that many Department of Conservation staff are members of the Network.

The NZPCN strategy 2016-2020 goals are:

1. Enhance the Network
2. Raise awareness of the importance of plants, their habitats and conservation
3. Communicate scientific and technical information on plants and their conservation in an accessible way
4. Promote and support plant conservation research and education
5. Support legal protection and appropriate conservation status assessments for threatened plants
6. Promote ex-situ plant conservation as a long-term conservation strategy

Where possible this submission addresses linkages between the DTSS and the NZPCN strategy goals.

## Key points:

### **Raise awareness of the importance of plants, their habitats and conservation within the final Threatened Species Strategy.**

Plant life is vital to the survival of all threatened wildlife – for food, habitat, shelter etc.

The DTSS does not give plants attention that is commensurate with their importance.

We would like to see more explicit recognition of the importance of threatened plants and their importance in ecosystems within the final Threatened Species Strategy.

We suggest an action is included within the Top 10 Actions that specifically address how the Department will raise awareness of the importance of native threatened plant conservation within the Department and to New Zealand's public.

## **Include an investigation into policy and legislation that legally protects plants**

We note that the DTSS makes reference to the fact that plants receive no direct legal protection - *'at present, they can only be safeguarded by formal protection of the land on which they grow'*.

We encourage the Department to include in Action 5 of the Top 10 Actions an investigation into how threatened native plants could receive direct legal protection outside of those safeguarded by formal protection of the land on which they grow, and review the Native Plants Protection Act 1934.

## **Include specific reference to ex-situ conservation in *'The right tools for the job'***

We commend the department for including several ex-situ conservation techniques and for highlighting the recent partnership between the Department and the Botanic Gardens Australia and New Zealand.

We are pleased at this signal that the Department is moving further into supporting ex-situ conservation techniques such as seed banking and cultivated living collections and strongly recommend that cryopreservation, tissue culture (storage and propagation), and field gene banking (seed orcharding) are also included.

In an attempt to cement ex-situ techniques as a viable option for supporting in-situ conservation within the Department, we suggest that the final Threatened Species Strategy specifically mentions the term ex-situ conservation as the umbrella term for helping to protect threatened species outside of its natural habitat.

We also recommend that Action 3 of the Top 10 Actions on page 40 is rewritten, broadening its approach from solely seed banking to include other ex-situ approaches as described above where they are identified as appropriate.

## **Support NZPCN within the final Threatened Species Strategy *'Working together in partnerships'* theme.**

While working together in partnerships is a principle theme of the DTSS, none of the goals or top ten actions seem to specifically support this.

The NZPCN was set up in 2003 to specifically to address Target 16 of the Global Strategy for Plant Conservation; namely that:

*Institutions, networks and partnerships for plant conservation are established or strengthened at national, regional and international levels to achieve the targets of this Strategy.*

The NZPCN currently has nearly 800 members involved a wide range of plant conservation work from central and local government, crown research institutes, NGOs, universities, botanic gardens, museums and private individuals.

Our website provides up to date information about native plant conservation in New Zealand. Receiving over 800,000 page views per year the website is a leading source of threatened plant information. Our biennial conferences are highly regarded as the best place to network with about plant conservation and to collaborate on shared issues and challenges.

As an existing means for networking people working with native threatened species, we ask that where appropriate the DTSS specifically support the NZPCN (and other organisations that support the Departments work) within the text of the strategy as a means to meaningfully address working together in partnerships for plant conservation.

### **Integrate Te Ao Māori and mātauranga Māori into species recovery programmes and national recovery planning systems.**

The Network regards working with Iwi essential for native palant conservation, however the detail supporting this goal is light in the DTTS.

The final Threatened Species Strategy needs to be more specific around how it might:

1. Address integrating Te Ao Māori and mātauranga Māori into species recovery programmes by 2025.
2. Ensure that national recovery planning systems integrate mātauranga Māori.
3. Resolve potential conflicting views that may arise between science and mātauranga Māori when incorporating Māori principles and knowledge into developing species recovery programmes and national recovery planning systems.

# New Zealand's Threatened Species Strategy: submissions for consultation

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## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

---

### Submitter details:

Name of submitter or contact person:	[REDACTED]
Organisation name: <i>(if on behalf of an organisation)</i>	Entomological Society of New Zealand
Email:	[REDACTED]
Signature: [REDACTED] <i>(we accept a typed signature if no electronic signature)</i>	

## Submission:

### You can answer all or some of the questions.

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

The Vision 'to safeguard our vulnerable threatened species' does not acknowledge that for some groups (e.g. invertebrates) we do not know what species are threatened.

2: Are there additional aspects that you think should be included in the vision?

3: Do you agree with the characterisation of the value and current state of our native species?

The pool of 483 threatened taxa from which the selections in the draft were made is not reflective of the biodiversity values of New Zealand. Basically all birds have been assessed but much smaller proportions of invertebrates, liverworts, fungi etc have been assessed. Although we understand there is a significant lack of knowledge, we would expect DOC to advocate for greater recognition of the importance of these poorly represented groups. Unless DOC, central government and New Zealand Society as a whole recognise the values of such taxa there will be no opportunity to increase expert capacity and undertake the work required to make NZTC assessments and develop management tools that will provide positive, cost effective, conservation outcomes for the greatest possible proportion of biodiversity.

4: Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?

We acknowledge the great conservation work done using current tools (Border biosecurity, Regulation, Prioritisation, Fenced sanctuaries, Captive management and Translocation) and support their continued use. However, we do not see them being applied appropriately for invertebrates. Effort needs to be directed into adapting existing tools for use across taxa. There are no **captive rearing facilities** specifically for Threatened insect conservation in New Zealand. We acknowledge such facilities would require expert knowledge but that foundation already exists. Billions of insects are reared globally for exhibits, biological control and pet food to name a few. The benefit of investing in such facilities in NZ would be immense and could provide opportunity for public engagement by linking to tourism, reserves and parks. People love seeing bugs close up if given the opportunity (note the recent success of Te Papa's 'Bug Lab' exhibition). Such facilities would enable collaboration with researchers to provide the much needed scientific basis for better management actions and decisions. The same can be said for **sanctuaries** – an example is the Nationally Critical Canterbury Knobbled weevil (*Hadramphus tuberculatus*) which is arguably one of New Zealand's most threatened insects yet its tiny habitat is still open to all manner of pests and weeds, is not protected from the potential threat of fire from the adjacent highway, and opportunities for advocacy are being wasted. **Translocation** as a tool is equally adaptable. No more than 12 insects and one spider have been translocated for conservation, often on only one or a few occasions,



despite the fact that multiple translocations are generally required for success. This equates to just 2% of the Threatened and At Risk insects compared to 22% of Threatened and At Risk birds that are managed using this tool. Translocation could be easily adapted to enhance protection of currently threatened insects and spiders and would arguably be more cost effective than it has been for birds, which require much more space and resources per individual. We urge the creation of translocation guidelines for threatened insect taxa similar to those that have been developed for native birds.

**Regulation** –The Draft Strategy notes land can be secured in a number of ways but we feel the Crown regularly fails to take the opportunity to purchase land for conservation (e.g. during the tenure review process). DOC should be insisting the Crown take up all opportunities to purchase land as it becomes available to strengthen DOCs ability to fulfil its mandate to protect or native biodiversity and the Strategy goal to ‘*not only to restore those species that are already at risk of extinction, but also to prevent others from becoming threatened*’. Semi-degraded habitats still have biodiversity values, particularly with regard to invertebrates, fungi, and range restricted plants etc. that exist on small local scales. We do not suggest land to be ‘locked up’ but protecting a range of ecosystems including semi-degraded land from further development, agricultural intensification, or other harmful land-use will protect already threatened insects. Importantly it will also prevent more taxa becoming threatened in the future by increasing resilience and connectivity across the board. Mt White Station is a current example – why does the Crown not have the first right of refusal to purchase such estates and take the opportunity to do so when presented. There have also been a number of instances where DOC have failed to make submissions against RMA consent applications, in our opinion to the detriment of biodiversity values on semi-modified land.

## 5: Are there other tools we could use to help us achieve the vision?

Advocacy & education – there is a desperate need to change society’s values with regard to how many and which species we should be protecting, but also how to protect them (e.g. use of controversial tools like 1080 as noted in the Strategy, recognising the harm widely-liked species like cats and hedgehogs cause to native fauna and our responsibility to control them).

## 6: Will the proposed goals help us achieve the vision and assess our progress?

Yes, the goals are on track however it is their implementation that is most important. Goals 1, 2, and 3 - increasing the number of species being worked on and intensify management of 150 priority species within the framework of Te Ao Māori are obvious and appropriate goals. Goal 4 is of more concern to us as a huge proportion of invertebrates are Data Deficient. We hope this goal receives as much focusing as it actually requires. For example, it is interesting to note that the multiplier used in the current priority species selection algorithm for ‘Not Threatened’ is 0.5 but there is no multiplier for Data Deficient.

We would also argue that DOC need to reconsider ‘what we need to know’ before management can be implemented. For many invertebrates there is a real risk that they will be monitored to extinction because there is a senses that there is not enough knowledge to take any action. We need to take the chance to make a change before it is too late. This is highlighted by the lack of on-the-ground action to protect and enhance populations of Canterbury Knobbled Weevil (as noted earlier) and practically all other insects with a current ranking of Threatened.

## 7: Are there alternative goals that you think will better achieve the vision and assess our progress?

We suggest a 5<sup>th</sup> goal focused on investing in greater public awareness of biodiversity values. Given social value is so pertinent to ranking for species prioritisation (as noted above) we would like to see a section in the Strategy devoted to educating the public (and government decision makers) on wider biodiversity values. This would improve DOCs ability to protect more threatened species in the future – providing the public support to focus more on currently lesser known taxa which are equally deserving and may well be easier and cheaper to protect than the current suit of ‘notable species’. It would also help direct resources into developing or adapting existing management tools (e.g. the cost of captive rearing or translocating invertebrates is likely to be substantially lower than undertaking the same management action for a bird). Values change constantly, this is clear by looking at effort that was historically put into establishing hundreds of exotic animals and thousands of exotic plants compared to the present day reversal. We believe DOC and organisations like the NZ Entomological Society should be working together, advocating for and educating society about the value of all components of biodiversity. This in turn would empower society to raise their voice and push for increased funding for conservation from central government.

DOC must lead the way by improving their own expert capacity by employing more threatened species ambassadors (Nicola Toki’s advocacy across a wide range of taxa has been refreshing and timely) and increasing the number of specialists working on taxa like insects (there are probably <5 experts currently focused on terrestrial invertebrates in DOC and it is a huge taxonomic group). There is an urgent need to develop positions dedicated to co-ordinating and co-funding research with universities, CRIs and other organisations beyond the National Science Challenges. There needs to be greater investment in DOCs science team to create pathways that allow research to be undertaken to reduce the proportion of species classed as Data Deficient and to adapt and develop tools to facilitate wider and more effective management of invertebrates. Scientific information gathered by DOC is also not published regularly enough and is difficult to access and therefore build upon. There are many excellent scientists that do not have a role in the National Science Challenges and we would like greater opportunity to collaborate with DOC to achieve our shared goals. Some of our members looked at the priority species list within this strategy and felt the advice they have provided over many years has not been listened to. DOC needs to take advantage of the capacity and expertise already present in New Zealand. Finding ways to facilitate collaboration between science providers and DOC to provide the necessary data on which management decisions can be made, and tools implemented, is essential. Our Entomological Society members regularly comment that obtaining permits to work on species or assess biodiversity is difficult to negotiate, although it has been improving in the last year. Many small *coordinated* efforts can have a big impact – as is noted in the Strategy with regard to predator free 2025 and community engagement etc.

## 8: Have we identified the right strategic themes?

Yes the themes appear appropriate

## 9: Do you agree with our top 10 actions?

The top 10 actions were not inspiring, we would like to see more focus on implementation.

With regard to conservation advocacy and public engagement noted above we would like to see an action focusing on;

- 1) Increasing staff capacity in DOC (threatened species ambassadors, more specialised positions focused on Data Deficient taxa)
- 2) Increasing taxonomic representation at tourism centres, on signage across parks and reserves etc. (several members of the entomological society have been working on educational signage in recent years and many more would support such initiatives)
- 3) Increasing collaboration with the scientific community to identify threatened species, understand what the threats are and develop management tools that can be put into action – this requires dedicated points of contact within DOC

We agree strongly with Action 8. *Select 500 of the data deficient species to focus researchers on further scientific work* but would like to see some indication of how this will be done, for example by including additional bullet points as per several of the other actions.

10: Are there any other actions that should be included, and any actions that should be removed?

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right • Too few

See comment below

### Comments:

12: Have we identified the right priority species?

We fully recognise there will never be universal agreement on priority species and resources to protect them are finite. Above, we have commented on some of the flaws we see in the selection process, primarily the high weighting of ‘notability’ or ‘iconic species’ and the limited nature of the pool of species from which the selections were made.

Although we are pleased to see some invertebrates have made the lists, Society members have raised a number of concerns including;

There is a relatively small number of invertebrates given the total proportion of diversity they represent – this reflects the list being drawn up from species *already being worked on*. NZTCS lists from the 2012 round include 193 threatened terrestrial invertebrate taxa, not to mention the 1055 At Risk and 1208+ Data Deficient.

There is a marked over-representation of snails (17 taxa) to the detriment of other invertebrate taxa. Again, we draw attention to the Canterbury Knobbled weevil which is absent from the list and we feel it should replace one of the snails in line with the information that species are *‘select on the basis of optimising taxonomic representation to secure as many orders, families, and genera as*

*possible, favouring taxonomic lineages that are endemic and taxa that are more threatened. If taxa are valued equally by these criteria a selection is made on the basis of conservation dependency*'. The Canterbury Knobbled weevil is Nationally critical, there are no other weevils on the list, it has great potential for public engagement, enhancing its population is feasible if adequately resourced, and if it does not receive management soon it is likely to become extinct.

There are only 3 insect Orders (beetles, moths, stick insects) represented. For example, none of the 2 Hymenoptera, 9 Hemiptera, or 27 'small and less known groups' listed as Threatened are included. Other non-insect arthropods, including velvet worms are completely absent. In addition, there are no spiders despite 3 species (*Maloides cavernicola*, *Zealocetus cardronaensis*, *Maloides cavernicola*) being listed as threatened.

There is an absence of fleas and ticks. We recognise most threatened parasites are associated with other threatened taxa (e.g. bird and bats) that are included on the list. We would, however, recommend highlighting these associations (even with a footnote) to show they are valued. For example the threatened flea *Porribus pacificus* will be protected by the inclusion of its bat host. This may also be the case for plant parasites.

There is an absence of alpine species (and some other important ecosystems) despite the fact that factors such as climate change pose a real threat to this fragile and environment. There is a real chance that climate change and the continuing expansion of weeds like wilding pines will put some whole communities, which are currently not threatened, at risk in the future.

We are pleased to see the inclusion of the Mahoenui giant weta but disagree with the 'Recovering' status. In recent years monitoring has suggested the original population at Mahoenui is in decline and the three translocated populations are insecure.

13: Do you think other species should be prioritised ahead of the ones listed? And why?

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

15: Do you have any further comments regarding the draft Strategy that is not covered above?

This submission was put together by members of the New Zealand Entomological Society and as such focuses on the impact of the strategy on insects and spiders. Our members also understand the plight of the many threatened species of other taxa and have taken a holistic view as much as possible. Although we would not wish to divert resources from equally threatened taxa, we consider invertebrates are at particularly high risk of being lost and forgotten. They are not the 'cute and fluffies' of the nation but we believe they would be valued more highly if DOC and organisations like us can show the rest of society their value. Between 2005 and 2011 only 3 threat-assessed insects

genuinely improved in their threat classification status (including the Mahoenui giant weta which we disagree with). In contrast, in the 2012–2016 review on the status of birds, 22 species (29%) improved. This shows management intervention can work – this is commendable - but insects (and other less notable taxa) are not receiving that input. 71 birds are now listed as Threatened; 55% have made the priority list. 22 Reptiles are listed as Threatened; 64% of which made the list. Up to 25% of Threatened snails (excluding *Powelliphanta*) made the list. Only around 13% of insect listed as Threatened made the priority list – another 640 or so are listed as At Risk, and 441 (likely a significant underestimate) insects are too Data Deficient to be accurately assessed. The story is no doubt similar for the category ‘mosses, liverworts, hornworts and lichens’. This shows the continued imbalance between current values and actual biodiversity needs, and we would like to see this problem given greater emphasis in the Strategy to ensure the preservation of as much of New Zealand unique biodiversity as possible.

Conservation submission. July 30<sup>th</sup> 2017

This in part is a journey.

A slow but sure realization of the truth as opposed to what I have come to see as a deep and concerning misrepresentation.

In February 2006, my family and I arrived here from the UK. We were very keen to settle in and participate in the kiwi way of life. My young primary aged children joined cubs and later the scouts. We as parents, gleaned an awful lot about the Kiwi culture through our children. Fascinated by New Zealand's natural history, we visited, Mount Bruce and other close conservation centres.... We lived in the Manawatu. We absorbed the information at Te Manawa, Te Papa, and other centres offering education and historical fact regarding the special place that NZ has within both the human and natural world. We also absorbed all the DoC had to tell us about pests and pest management!!

We moved from the town to a lifestyle block, met up with native species in the wild. Everything from Tui. Keruru, Morepork, to eels, Koura and Kōkopu. Not forgetting of course the mice the rats and the possums!!

As we lived and learned, I began to become very uneasy. Years before, when I was a child, I lived on a poultry farm. 500 or so freerange chickens. Chickens and other farm stock attract rats and mice. These have to be controlled or they get out of hand. There would be long family discussions as to 'how'? I was brought up knowing the dangers of poison... to myself, to my pets, and to the animals that earned us our living. I watched my mum and dad take great care as to where the bait was located. Dead creatures were removed immediately. We kept everything safe. Never lost anything to poison except those targeted. I also saw.... at a very young age, the suffering of those that had succumbed to an easy meal. It stuck firmly in my mind.

1080. Not Warfarin, but another poison even more deadly. (One that is tasteless and odourless has even been the subject of an FBI terrorist review). Not placed carefully with due consideration, but scattered to the four winds anywhere that the department of conservation thinks it too difficult to manage by other means. This does not tally with my early experience of poison use. It made me very uneasy so I started to question.

New Zealand says, that a variety of pests have arrived here since human habitation, pests that kill the precious native birds. The most voracious of these being the possum, the stoat, the rat and the mouse.

If I check any site remotely linked to Nz that discusses possums, I am informed, they carry TB and eat chicks and eggs....The predation of bird eggs and chicks has led them to be referred to as "reluctant folivores" in that they eat foliage to survive but prefer other foods.<sup>[10]</sup>

([https://en.wikipedia.org/wiki/Common Brushtail\\_possum\\_in\\_New\\_Zealand](https://en.wikipedia.org/wiki/Common Brushtail_possum_in_New_Zealand)).

This is true of just about any site that I call upon to give information regarding the possum. There are also photographs, and video's of possums eating/attacking birds in nests.

I asked around. Those with knowledge of natural history, informed me that possums are not equipped with the necessary dexterity or jaw to take on prey and to kill. Opportunist omnivores at best. So I did a little more digging...

I checked for information in Australia. Visited the zoo site.

I found this... <https://www.australiazoo.com.au/our-animals/mammals/possums-and-gliders/common-brushtail-possum>.

#### Under **Diet**

Eucalypt leaf and other leaf species are the main source of diet for common brushtail possums. As you can imagine, these have quite a low nutritional value, so the possums supplement their diet with other things such as grasses, herbs, flowers, fruits and insects. The proportions of these foods vary between habitats, and the most common food is not always the most preferred. Here at Australia Zoo, we try to maintain the possums' natural diet as much as possible, and the keepers are always on the lookout for suitable leaf and flowers.

Not one mention of eggs or birds.... Note, **we try to maintain the possums' natural diet as much as possible, and the keepers are always on the lookout for suitable leaf and flowers.**

Hmmn. One conclusion, either the initial description of the possum and its diet in NZ is false, or, since arriving here it has evolved into a separate species. Maybe the NZ Brushtail Possum? In Which case, it is a naturalised species specific to NZ and should probably have protected species listing and protection?????????

Putting this to one side, there is a fairly comprehensive study, which looks at seed dispersal across many species, both introduced and native. It really shows how important it is to have knowledge across the whole subject area, including evidence and data. Although the study agrees that possums can cause damage (true of any species including us when numbers over run resources, or when resources are extracted for profit), it does suggest that possums if controlled, rather than eradicated, have a job within the native system.

<http://newzealandecology.org/nzje/3286.pdf>

A little more about the possum. TB. Bovine TB, not possum TB. *Therefore the possum collects the disease from the cow, not the other way around. Also NZ First's Richard Prosser says more than 124,000 possums were autopsied over the last 10 years and only 54 had bovine TB - a rate of 0.04 per cent.....*

(<http://www.newshub.co.nz/home/politics/2015/10/prosser-possums-dont-spread-tb.html>)

Further consideration should be given to the fact that

*"Coupled with the wild animal figures that we have from the government's records, this strongly suggests that effective movement control has been the real answer to TB in cattle all along," he said.*

*"The single biggest reservoir and vector for bovine tuberculosis is cattle. It always has been cattle."*

**From the same article as referenced above.**

Yet Ospri is still blaming possums... <http://www.tbfree.org.nz/bovine-tuberculosis-information.aspx>

Also this....

Bill Benfield, author and conservationist, said New Zealand had wrongly built up a pest management industry based on the false belief that possum spread bovine Tb. That fallacy was exposed in the House by Minister of Primary Industries Nathan Guy on 12/6/2015, when he advised New Zealand First MP Richard Prosser as follows :- *the scientific uncertainties associated with determining the source of infection at the individual animal level and the resource required to do so mean that it is not considered an efficient use of time and resources to routinely make such a determination.*” i.e. **There is no epidemiological evidence linking possum to Tb in cattle, and OSPRI is not looking for it!**

Interesting that Ospri,, TB Free and the Minister for primary industries took apparently 7 weeks to answer what should have been a simple question back in July 2015. Data for this should be immediately available especially after all the resources that are put into this sector. Just no excuse!!



Before I move on.

Recently it was discovered that this photograph was from a small orchard at the rear of a [REDACTED] property (Ohau). The vine had been secured to the tree and the camera had been set up probably for a week or so to allow these animals to become familiar with the noise and camera flash. The nest is supposedly, (although this has changed according to where the photo is published), that of a song thrush. (<http://nzbirdsonline.org.nz/species/song-thrush>).

*-They nest in the forks of shrubs or trees several metres above the ground and usually well concealed by foliage. The nest is a tightly woven bowl of grass, small twigs, lichen, wool, dead leaves and lightly lined with mud. -* Many have checked this. The thrush does not use holes in trees for its nests. It prefers the ends of a branch where it secures it between twigs. Their nests are neat. There is rather too much nesting material here even from a ruined nest. Again. Scene tampered with for photo shot. Unlikely positioning of possum which looks very uncomfortable. Suspect this to be false!!

The propaganda against the possum, is so complete, that NZ has managed to shock the rest of the world. The Drury School, with its Possum hunt to raise school funds, hit the headlines world wide putting focus on NZ and its inability to understand, after years of condemnation, that these so called pests are sentient animals with feelings. Empathy is part of being a human. To treat any creature with such utter disdain shows the culture for what it has become!!



Rats.

We are informed, that 1080 is necessary due to rat infestations and plagues of BIBLICAL PROPORTIONS!!

How many people I wonder have seen a rat plague?

Where do they exist?

Who is responsible.

I am going to deal with the last question first.

Humans brought rats here. They arrived with the first invader of these islands of birds, the Maori.

Rats adhere themselves to our species. We are basically a free meal ticket. We create mess, trash and food. All the things these creatures need to survive. Our historical companions for as far back as we would like to research. Today, we find them wherever we leave rubbish. If we really want to eradicate, we should start with our own habitations and rubbish dumps. Never mind sewers and foul river water. Clean up our own mess and we could bring their numbers down.

I once saw a rat plague. Every blade of long grass was moving. It was difficult to see where the body of one rat ended and the tail of another began. As far as I could see for about 100 meters in front and to the sides, everything moving. I had chanced on a footpath that led to a rubbish dump and it was alive. I did not stay long!!!!

Rats are intelligent. They don't take bait easily. So when we use 1080, they need pre bait. More expense.

Just about everything I have read re 1080 and rats, says that after a 1080 drop, when successful, up to 95% of the rodents are killed. Brilliant, however, rats breed like crazy, and within 18 months the population has exceeded pre poison numbers.

<http://i.stuff.co.nz/nelson-mail/news/4570628/Rat-plagues-linked-to-1080-poison-drop>

This poses a major problem and concern. Contrary to the information given by the authorities, we know that the bait is also taken by birds.



Birds do not reproduce at the same rate as the rats.

Therefore there comes a time when rat numbers exceeding their pre 1080 numbers, pose a greater threat to bird life than had nature been left to her own controls. There is another problem too. Stoats preferred food is the rat. They will switch to birds when the rat numbers are cut to minimal. So the poor birds get hit not once but thrice... the poison, as stoat prey whilst rat numbers recover, then as rat fodder when their numbers increase post poison... yet this is not publicised????

<http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.411.4535&rep=rep1&type=pdf>

## ***CHANGE IN DIET OF STOATS FOLLOWING POISONING OF RATS IN A NEW ZEALAND FOREST***

*Summary:*

*The abundance and diet of stoats (Mustela erminea) were compared before and after an aerial 1080-poison operation for possums (Trichosurus vulpecula) in a New Zealand podocarp-hardwood forest. Poisoning dramatically reduced ship rat (Rattus rattus) abundance. Although rats were the main prey item of stoats before the poisoning, stoat abundance was unaffected by the operation and there was a change in stoats' diet from rats to birds. The conservation benefits and risks of undertaking such operations are not clear. It is not known whether the predation risk for any particular species of bird (or other animal) will be higher or lower with fewer rats but the same density of stoats; **As large-scale poison operations are now common in New Zealand forests, a better understanding of predator-prey relationships in these areas is required as soon as possible.***

**So possums are not the pests they are painted as being. There is more information out there exploring the part that the possums do in modern day NZ, now that it is devoid of the native species that helped to propagate by seed movement in the native forest. Not enough time and resources have been spent on this. So the likelihood is that our narrow, biased views will not be challenged for some time.**

**Rats, feast and famine for the stoats which switch prey to our native species when the rat population is drastically reduced.**

**As for rats themselves. I found interesting reading concerning their diet.**

[https://www.google.co.nz/search?q=Diet+of+the+rat+in+the+wild&ie=utf-8&oe=utf-8&client=firefox-b&gfe\\_rd=cr&ei=ssR9Wb2AHcvu8wfv2YmIDw](https://www.google.co.nz/search?q=Diet+of+the+rat+in+the+wild&ie=utf-8&oe=utf-8&client=firefox-b&gfe_rd=cr&ei=ssR9Wb2AHcvu8wfv2YmIDw)

*Wild rats are opportunist omnivorous eaters. That means they will **eat** whatever they can find. In most cases, this includes grains, fruits and vegetables, seeds and nuts and any other edibles they might find. Although **rats** prefer to **eat** what they find, they will hunt in occasion, catching bugs and other small animals.*

So a whole range of foods, not specifically birds and eggs. Again, if we controlled numbers at source... where we are, and looked after our own husbandry regarding our waste in its different varieties and sources. I wonder the impact that that in itself would have?

I am leaving mice. For 1080 is not really aimed at them. They are far harder to control in the forests. I need to move on.

Now we come to the poison itself.

One of the biggest problems regarding this poisoning regime, is the reluctance of the authorities concerned to actually do the necessary science.

There are no tallies regarding bird species and dominancy before a drop. No count after a drop. No testing for the presence of the poison in any fallen birds. We are told the numbers of rat deaths. Yet no carcasses are ever collected, so the tally cannot be confirmed.

Further, according to the warnings on the product label, below and other examples, <http://www.scoop.co.nz/stories/SC1409/S00058/mt-pirongia-poison-drop-breaches-1080-warning-label.htm>

New Zealand constantly, ignores warnings and instructions for use.

It is as if, in transit here, the poison becomes safe to abuse.

We see picture of disposal teams, many unmasked, with the powder blowing in the wind.

We have the pellets scattered in the water, when the label clearly states that the product should not come into contact with water courses.

There have been instances when animals have broken out of their paddocks, possibly frightened by the helicopters, which has meant that they have stumbled into contaminated areas.

This is featured on <https://envirowatchrangitikei.wordpress.com/2016/09/23/the-stock-deaths-from-1080-poison-how-doc-is-hiding-them-in-the-paper-work-still-trust-them/>

We do not know, and cannot be sure that 1080 has not entered the food chain, either in milk, or red meat from these affected animals.

In reality, any research will uncover so much that is not reported by DoC.

I think this is one of the major bones of contention. Lack of reporting and coverage. Lack of data concerning numbers of natives and other species in given areas before and after the drop. Lack of testing on any animal, native or otherwise, when it is the boundary of farmland (surely for the sake of the farmer, and those in the area with pets, such carcasses should be lifted and disposed?)

Lack of recognition that this is a lethal A class substance. Placed into a bait, dropped into natural habitat. It does not take much intelligence to acknowledge the fact, that species other than those targeted will be attracted to the poison.

It is very difficult, neigh, nigh on impossible to accept any figures, or reports of success brought to us by those in charge, when there is this reluctance to back up supposed success without the appropriate data.

How hard can it be? The study above, showing seed dispersal, is a far more difficult objective to achieve, than a count of a given number of species within any area. The data above provides estimates based on sightings of nests and birds and records. It would not be hard to go back after a few weeks, to discover how many of those recorded species were still prolific in the study, following a drop.

It would also, not be difficult, to use the same methods, to check for rodent and pest numbers prior to an area being ear marked for 1080, to ensure that the operation is indeed necessary. Yet, we do not seem to be able to locate such detail.

Pest eradication is a science. Dropping poison in an uncontrolled manner into the environment without data is a travesty!!!

What is the point of a label, if the label is to be ignored.

**DANGER - DEADLY POISON**  
**KEEP OUT OF REACH OF CHILDREN. ECOTOXIC.**  
HSNO CLASSES: 6.1A, 6.3B, 6.4A, 6.8A, 6.9A, 9.1A, 9.3A, 9.4B

**1080 SOLUTION**

To be incorporated into baits for poisoning of rabbits,  
possums, deer or wallabies.  
Soluble concentrate containing 200g/litre sodium fluoroacetate.

**Acutely toxic:** May be fatal if swallowed, inhaled or absorbed through the skin. Repeated exposure may damage fertility, the unborn child, and internal organs. When handling open containers or baits, wear full protective equipment as shown in precautions box below in order to avoid all skin and eye contact.

**Very toxic to terrestrial animals and phytotoxic to many plants:** Take measures to reduce the risk to non-target animals which may either eat baits treated with the substance or which may scavenge the carcasses of poisoned animals.

**Very toxic to aquatic life:** Manage bait application rates carefully and comply with any restrictions imposed on placing baits over or near waterways. Avoid pollution of any water supply with the substance or used container.

**Symptoms of poisoning:** Early Symptoms: Nausea, vomiting, tingling and numbness in face and hands, stomach pains, apprehension and anxiety. Later Symptoms: Muscular twitching, blurred vision, mental confusion. Severe Symptoms: Coma, convulsions, death.

Indeed, are we not all told and taught from an early age to read labels and be very wary of any that say POISON?

From the behaviour of the pro poison groups, and all of those involved in the handling of this substance, it would seem that the warning on the label is of little significance. My theory is, the substance loses its toxicity when it reaches these shores. We see people loading the baits, with no or little protective clothing. We do see others fully covered, but many of the film clips of crew, show people without face masks or protective covering to the head, eyes, and mouth. We see the dust from these baits in the air, but some people are allowed to expose themselves?

Does this clearly not state. Very Toxic to aquatic life? Manage bait application rates carefully and comply with any restrictions imposed on placing baits over or near water ways?

Yet our waterways are being targeted?

I seem to remember quite clearly as a child, being informed, that dead stock in a water way were likely to cause contamination downstream. Indeed, that we should be careful not to put anything in a water system that could cause health problems to those further down?

So why would we not be alarmed, when our department of conservation, has the dropping of this toxin rubber stamped by our department of health, allowing not just bait, but toxified carcasses to remain in the water system for weeks and months? ILLOGICAL, to say the least, especially when you read the label!!

So really, what we are being told by example, is that this toxin, loses its toxicity as soon as it becomes a bait. Allowing anyone to handle it without full protective gear. The dust being blown around by the helicopter blades is of no significance. The dust which will get into the nooks and crevices of the rescue helicopters is of no significance. Of no further harm to any future occupant. The baits in the stream, cannot harm the waterways. The dead animals in the water, pose no threat to environmental health!!! Indeed, the toxin only becomes potent when the correct animal eats it, or eats a corpse contaminated by it. Everything else is immune!!!

<http://asiacruisenews.com/news/How-a-toxic-spill-and-a-book-launched-Britain%E2%80%99s-environmental-movement>

The above is in reality, a true horror story. The tale of a toxin which took a sleepy village by surprise. Killed a number of dogs, and then saw the demise of a herd of young friesian cows. The farmer noticed that the milk yield had dropped. A number of them then aborted their calves. Some calves, were still born, the others died within days or weeks of birth. The cows lost condition, developed lumps on their heads and throats. All eventually died or had to be put down. Two more dogs died after getting too close to the carcasses. The bodies were deemed too toxic to be buried so were burned and the ashes buried deep. They had been intoxicated from a nearby factory, whose product had leached into a stream supplying their drinking water. Ponds, the stream, the whole area had to be sluiced and scrubbed. The wash off water, was taken by tanker to the coast, the sludge was taken to a disused quarry and deposited deep in the ground. Far too hazardous to be dumped in the sea. 1080 we are told by our government is safe. It does not contaminate waterways. It does not collect in sufficient amounts to be of concern.

The last part of the above tale says otherwise. Having sluiced and cleaned ponds and streams, and anywhere else that could have been affected, one man in the clean up brigade, neglected to wash his wellington (gum) boots. They were the only link between him and his dead house cow. The cow tested positive to the poison!!

*Banned in most countries & classified by WHO as 'Highly Hazardous'... 1080 is a broad-spectrum poison that kills ALL oxygen-breathing animals and organisms – Dr Meriel Watts*

So to conclude.

It seems that we have been misled about the feeding habits of the possum. It is an omnivore, an opportunistic omnivore. Not a predator. It mainly eats leaves, but will when the opportunity arises eat fruits, berries, herbs, grass and maybe the very odd egg.

Bovine TB, is what it says it is BOVINE TB. The truth is that this can be controlled most easily via cattle movement, or non movement programs. We do not need to eradicate it or possums from the environment via poison programs. There are other methods to do this.

Possums may well help with seed distribution, but numbers will need to be controlled. I have not touched on this above. But there is a pelt industry in NZ. Possum fur is one of the highest quality to be found anywhere. As a sustainable source, the possum numbers could be viably controlled. The industry would be of great benefit to GDP.

Rats and mice. A product of our lifestyle... OUR LIFESTYLE. A cleaner environment, and environmental traps, where we encourage them to journey to a certain place, should mean that we fight their numbers on OUR territory NOT theirs. If we entice them, we also entice stoats, which will follow their favourite prey. We might never eliminate them, but we

certainly should be able to control numbers more efficiently. After all, if beech masts attract so much. I am certain we can devise an attractive alternative. Intelligence is key in any war. No difference when dealing with a pest!

As to the poison. Authorities need to front up. It is not banned across the world for no reason. It does not fit the once clean green and pure idea of NZ. Now heavily tarnished. Whether the title can ever be regained, anyone guess. Certainly will not happen until the poison is banned, our waterways cleaned, sense and reason applied to all industry.

Certainly, I for one feel that I was misinformed, brainwashed, and led to believe that there was no alternative. Now I am convinced that authority is out to look after its own. Has no care for the environment, or the public who rely on its health.

One final point.

Does the DoC have any idea as to Kea numbers in the wild?

Should have data, evidence and research records.

Below is a real concern and I among others would like answers!!

<http://i.stuff.co.nz/environment/91163868/Female-kea-population-declining-rapidly>

Interestingly, the bottom line here is that males are found more commonly than females?

Females being more open to predation whilst on the nest?

This has always been the case, ever since predators arrived here. Question is, what are we doing that could have caused this recent drop in population?

I am not going to speculate. I should not have to. Kea are a native species, for them to be in such plight, there should be a historical data record. Also maps showing 1080 drop zones in their areas, and data proving beyond doubt, that it is not adding to their decline.

So, I am asking for this data. I want it made public. I want to know, beyond vestige of doubt as to why Kea numbers are falling?

**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 4:29 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
Organisation:  
Email: [REDACTED]

- q1:
- q2: Hunting and fur trapping, and recreational hunting not properly considered in this draft.
- q3: No
- q4: No
- q5: Yes
- q6: No
- q7: Accept biodiversity is more realistic
- q8: No
- q9: No
- q10: Yes
- q11:
- q11comments: Realistic conservation is needed
- q12: No
- q13: No
- q14: No
- q15: It is unworkable and unattainable



The Pew Charitable Trusts  
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WWF-New Zealand  
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## **Pew Charitable Trusts and WWF-New Zealand submission in the draft Threatened Species Strategy**

We are grateful for the opportunity to comment on the Department of Conservation’s draft Threatened Species Strategy. A strategy aimed at halting the decline of our native biodiversity is urgently needed, however the current proposal will need some further development to meet that challenge. In this submission we highlight the key issues with the draft, and we outline how these issues can be addressed in the recommendations section.

### **1 Issues**

#### **1.1 The strategy will not enhance protection of New Zealand’s marine species**

##### **1.1.1 Marine species are under-represented in the strategy**

As currently drafted the proposed strategy is overwhelmingly focused on the terrestrial environment and species, including only a fraction of the indigenous marine species under threat in New Zealand. This is despite the fact that species across the marine environment are increasingly under threat from such factors as climate change (ocean acidification); plastic pollution; land based pollution (nutrient run off and sedimentation); over fishing; and fisheries by-catch of protected species.

New Zealand’s marine environment is 15 times larger than its land area, and its ocean territory considered a biodiversity hotspot of global significance. Yet only 11% of the 150 priority species listed in the Strategy are marine species.

Many of New Zealand’s marine species are wide ranging and utilize large areas of the pelagic marine environment (outside 12 nm, and many beyond the EEZ) for feeding or migration, often coming to / close to land to breed. See Appendix I for maps of selected wide ranging marine species. The complexity presented by the wandering nature of many marine species (for species protection and management) is not a reason to exclude them from the threatened species list.

There is no clear reasoning for the Strategy’s neglect of the marine environment. Considering recent reports showing the dire state of New Zealand’s marine biodiversity – that 28% of marine mammals are



endangered, and 90% of our native seabirds and shorebirds are threatened with or at risk of extinction<sup>1</sup> – a focus on marine species should be a Strategy priority.

### **1.1.2 No effective tools or strategies for protecting marine species**

The Strategy contains little detail of how the conservation of the small number of marine species that are included on the list will be enhanced. In the absence of that detail the Strategy appears to rely on the proposed Marine Protected Area (MPA) legislation as the mechanism to deliver protection of the marine species included in the Strategy.

If the Strategy for marine species is to rely on MPA legislation it is fundamentally flawed, because the current MPA legislation consultation document does not have an EEZ scope (i.e. the NZ marine territory beyond 12nm). Yet, without a clear mechanism for spatial protection beyond 12 nautical miles the great white shark and bubblegum coral (found predominately outside 12 nm), New Zealand Sea Lions (that forage well outside 12 nautical miles), and all of the sea birds prioritized in the strategy, will continue to face current and growing threats across their range (Maps of selected species in Appendix I).

### **1.1.3 Fisheries bycatch of protected marine species is not addressed**

Accidental capture of seabirds and marine mammals in commercial fisheries (termed 'bycatch') is commonly the top human threat affecting protected marine wildlife, and the Threatened Species Strategy does not adequately recognise this. New Zealand currently lacks an effective policy framework to address the decline of marine wildlife due to fisheries bycatch and the Threatened Species Strategy could be the place for this. Experience from overseas shows that key components of effective bycatch policy are:

1. A clear vision and aspirational goal to drive continual improvement, innovation and efficiency e.g. a zero bycatch goal.
2. Effective risk assessment and science processes in order to understand the size of the problem for different species and fisheries.
3. Clearly defined management and conservation objectives; and steps and processes to achieve the goals including requirements for data collection, monitoring and enforcement.

#### ***New Zealand lacks a clear vision and aspirational goal for bycatch management***

Many countries in the world have adopted aspirational goals for bycatch management such as the Zero Mortality from Fishing Goal in the USA (Marine Mammal Protection Act 1972) and have found these to be useful to set clear intention and drive continual improvement, innovation and efficiency.<sup>2</sup> New Zealand has no clearly stated vision/goal for reducing protected species bycatch. There is useful legislation that sets high-level requirements for the management of fisheries impacts, such as the requirement under the

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<sup>1</sup> Of the 32 seabird and shorebird species and subspecies threatened with extinction, 12 are nationally critical, facing an extremely high risk of extinction, including species of albatross, shag, petrel, and penguin (MfE and Stats NZ, 2016). Five marine mammal are 'nationally critical', facing an extremely high risk of extinction – Bryde's whale, Māui dolphin, New Zealand sea lion, orca, and southern elephant seal; and two are 'nationally endangered', facing a high risk of extinction – Hector's dolphin and bottlenose dolphin. (Ministry for the Environment and Statistics New Zealand, (2016) New Zealand's Environmental Reporting Series: Our marine environment 2016.)

<sup>2</sup> A zero bycatch goal is an aspirational management goal that has been adopted into legal fisheries management frameworks in the USA, EU, the UK, Australia and signatories to ASCOBANS – including: Belgium, Denmark, Finland, France, Germany, Lithuania, Netherlands, Poland, Sweden, UK.

Section 9a of Fisheries Act 1996 that: “associated or dependent species<sup>3</sup> should be maintained above a level that ensures their long-term viability.” However, existing law does not provide a clear drive for continual improvement, and protection of threatened species.

The importance of clear bycatch reduction targets to drive improvement in fisheries bycatch management is well documented and is a priority in the National Plan of Action for Sea birds, however this has not been implemented through the Five Year Fisheries Management Plans in any comprehensive way. Furthermore, while there is legislation to enable the setting of Fisheries Related Mortality Limits (Marine Mammal Protection Act, 1978), this has only been used for one species – New Zealand Sea lions, and the setting of management goals and objectives (or “reference outcomes”) has been adhoc, without proper consultation with stakeholders, and the goals are not set to achieve legal requirements to maintain long-term viability of species.

The lack of an effective bycatch policy framework means that New Zealand is falling further behind international best practice, and our protected marine species continue to decline.

## **1.2 The Strategy is currently underdeveloped and does not have necessary detail, government support and funding**

### **1.2.1 Where’s the detail?**

A ‘strategy’ should detail how goals will be achieved, but there is no detail to guide and facilitate action and implementation of the proposed Threatened Species Strategy. Detail missing includes who will be responsible/accountable for the work, in what timeframes, and milestones to enable monitoring of progress over time.

### **1.2.2 Where’s the capacity and funding?**

It is not clear how the Strategy will be funded. Over the last 9 years, the core budgeted funding for protecting New Zealand’s native animals, plants and landscapes has declined in real terms by nearly 21%. We support Forest & Bird’s call for DOC’s core natural heritage budget to increase from \$152 million this year to \$330 million per year over the next four years<sup>4</sup>, with a significantly increased focus on marine conservation.

### **1.2.3 Where’s the cross government cooperation and alignment?**

Effective conservation of native species requires collaboration between key departments. To be effective, the Threatened Species Strategy must be structured to ensure that department policies are better aligned. Situations where fisheries impacts need to be reduced in order to protect marine species is an example where cooperation between MPI and DOC is necessary but at the moment, is often fraught and ineffective. A clear example is the management of threats to sea lions. While the Government’s Sealion Threat Management Plan (TMP) sets out a vision for sea lion population recovery over the long term, requiring a

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<sup>3</sup> Protected species such as sea birds and marine mammals are “associated” species as they are in the same waters as the target fish stocks.

<sup>4</sup> [www.forestandbird.org.nz/what-we.../budget-delivers-12-million-less-native-wildlife](http://www.forestandbird.org.nz/what-we.../budget-delivers-12-million-less-native-wildlife)

reduction in human threats including fisheries bycatch of sealions, the relevant Fisheries Operational Plans has alternative goals.<sup>5</sup>

## 2 Recommendations

### 2.1 Include in the strategy an expanded list of marine species

The list of 150 priority species should include a representative list of marine species. We suggest that, at a minimum, the list be expanded to include all marine species currently listed as Nationally Critical, Nationally Endangered, and Nationally Vulnerable. (See appendix II) Future additions to the list may be required as new species are discovered / identified or are 'promoted' to threatened status by marine ecosystem or land based changes.

### 2.2 Enable marine protection across the full scale of the EEZ and beyond

The Threatened Species Strategy focuses on creating safe spaces on land through pest eradication for our vulnerable native species. An equivalent focus on creating safe spaces in the marine environment is required if the Strategy is to reflect protection of the full scope of NZ species diversity. Fully protected marine reserves are regarded (by scientists and ocean policy makes and managers worldwide) as the most effective tool to protect a large number of pelagic and site based marine species. Enabling that effective marine protection will require passage of the Kermadec Rangitāhua Ocean Sanctuary Bill and MPA legislation that enables spatial protection beyond 12 nautical miles.

Marine protection as a Threatened Species Strategy New Zealand has committed, under Aichi Target 11 of the Convention of Biological Diversity (CBD), to representatively protect at least 10% of its marine environment by 2020. Scientists are now recommending that 30% of a country's marine environment be the new target for protection<sup>6</sup>. Currently less than 1% of New Zealand's marine environment is fully protected. This will increase to 15% with passage of the Kermadec Rangitāhua Ocean Sanctuary legislation. However, if the Kermadec legislation is further delayed, and the current draft of MPA proposals are reflected in legislation, New Zealand will continue to fall far short of its commitment to the CBD, with no mechanism to protect representative areas and species beyond 12nm.

Research published in Nature in 2014 has found that effective marine reserves (those that provide optimum protection to marine habitats and species) have five key characteristics: **No** fishing, well **Enforced**, more than 10 years **Old**, relatively **Large** in area, and **Isolated** from fished areas by habitat boundaries (acronym: NEOLI). Marine reserves that have 4-5 of these characteristics were found to have on average

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<sup>5</sup> For an example, the proposed Squid 6T Operational Plan intends to set 5-year management goal that is not explicitly related to the TMP long-term recovery goal. In-fact the Operational Plan is likely to propose an increase in the number of sea lions that can be killed in squid trawl fisheries (the Fishing Related Mortality Limit). This would go against the TMP, which recognized that multiple threats affecting the Nationally Critical sea lions (including from fishing) need to be reduced in order to achieve the long-term recovery goal.

<sup>6</sup> O'Leary, B. C., Winther-Janson, M., Bainbridge, J. M., Aitken, J., Hawkins, J. P., & Roberts, C. M. (2016). Effective coverage targets for ocean protection. *Conservation Letters*, 9(6), 398-404.

twice as many species of large fish per transect, eight times more large fish, and 20 times more sharks than fished areas<sup>7</sup>.

Scientists are also telling marine environment management and advocates that fully protected marine reserves are also climate reserves, helping marine ecosystems and people to adapt to five key impacts of climate change: ocean acidification; sea-level rise; increased intensity of storms; shifts in species distribution, and decreased productivity and oxygen availability. Reserves can promote uptake and long-term storage of carbon from greenhouse gas emissions, protect coasts from sea-level rise, storms and other extreme weather events<sup>8</sup>, help offset climate-change induced declines in ocean and fisheries productivity, provide refuges for species as they adjust their ranges to changing conditions – thereby acting as a genetic bank, and can help combat acidification<sup>9</sup> - all of which represents positive scenarios for threatened species.

### **2.3 Transboundary strategies**

New Zealand has recently signed a Memorandum of Understanding with China to protect several Chinese wetland areas important for migrating bartail godwits. This partnership agreement provides an important example of how New Zealand can pursue strategies to protect species that range outside New Zealand boundaries. The Threatened Species Strategy should build on this work, strengthen partnerships with SPRFMO, Chile and Australia to identify where and why the population of female Antipodean albatross is collapsing, and identify the measures needed to protect the birds across their whole range.

### **2.4 Environmental education and behavioural change**

Pollution (plastic, fishing gear, waste) is recognised as a major threat to our marine habitats and species, particularly seabirds, turtles and mammals (all of which feature on New Zealand's endangered species list). The ocean plastic threat is going to continue to increase unless social behaviours change. As such, New Zealand's Threatened Species Strategy needs to include government policy and environmental education investment focused on reducing plastic use and tightening rubbish disposal.

### **2.5 Enable pest eradication around vulnerable seabird nesting sites**

Pest eradication is a dominant theme in the Threatened species strategy. The focus sites for this pest eradication should include vulnerable seabird nesting sites as well as sites targeting other vulnerable terrestrial birds.–Pest eradication at nesting sites however should not be done in isolation; this work needs to be done in coordination with the introduction of protection measures across the vulnerable species range (including best practice bycatch mitigation, spatial and temporal fishing closures, trans-boundary collaboration, plastic bag levy etc). The best outcome for threatened seabird population recovery will come from the combined effort of terrestrial pest eradication at breeding sites, meaningfully scaled marine protection, and reducing offshore human induced mortality (i.e. fisheries by-catch and ingestion of plastics).

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<sup>7</sup> Edgar, G.J., Stuart-Smith, R.D., Willis, T.J., Kininmonth, S., Baker, S.C., Banks, S., Barrett, N.S., Becerro, M.A., Bernard, A.T., Berkhout, J. and Buxton, C.D., (2014). Global conservation outcomes depend on marine protected areas with five key features. *Nature*, 506(7487), 216-220.

<sup>8</sup> Protecting coastal habitat structures helps to buffer against coastall erosion.

<sup>9</sup> Roberts, C.M., O'Leary, B.C., McCauley, D.J., Cury, P.M., Duarte, C.M., Lubchenco, J., Pauly, D., Sáenz-Arroyo, A., Sumaila, U.R., Wilson, R.W. and Worm, B., (2017). Marine reserves can mitigate and promote adaptation to climate change. *Proceedings of the National Academy of Sciences*, 114(24), .6167-6175.

## 2.6 Adopt a zero bycatch goal for protected species

A zero bycatch of protected species should be the aspirational management goal. This goal has been adopted into legal fisheries management frameworks in the USA, EU, the UK, Australia and signatories to the Agreement on the Conservation of Small Cetaceans of the Baltic and North Seas (ASCOBANS).<sup>10</sup>

A zero by-catch goal means that while there is always likely to be some bycatch associated with commercial fishing, management efforts should work towards reducing bycatch of protected species as much as possible towards zero.

Just as the 'Predator-Free NZ' aspirational goal has been useful in the development of policy and strategy for conservation of terrestrial biodiversity, a zero bycatch goal would provide clear ambition and intent for our marine protected species affected by fisheries and guide the development of effective bycatch management policy.

A recent Colmar Brunton poll shows that zero bycatch goal aligns with New Zealanders values. From a representative sample of 1000 people, 83 % agreed or strongly agreed that New Zealand should adopt a zero bycatch goal, which should aim to reduce the number of marine mammals killed by commercial fishing towards zero.

### Most New Zealanders think that New Zealand should adopt a zero fisheries bycatch goal

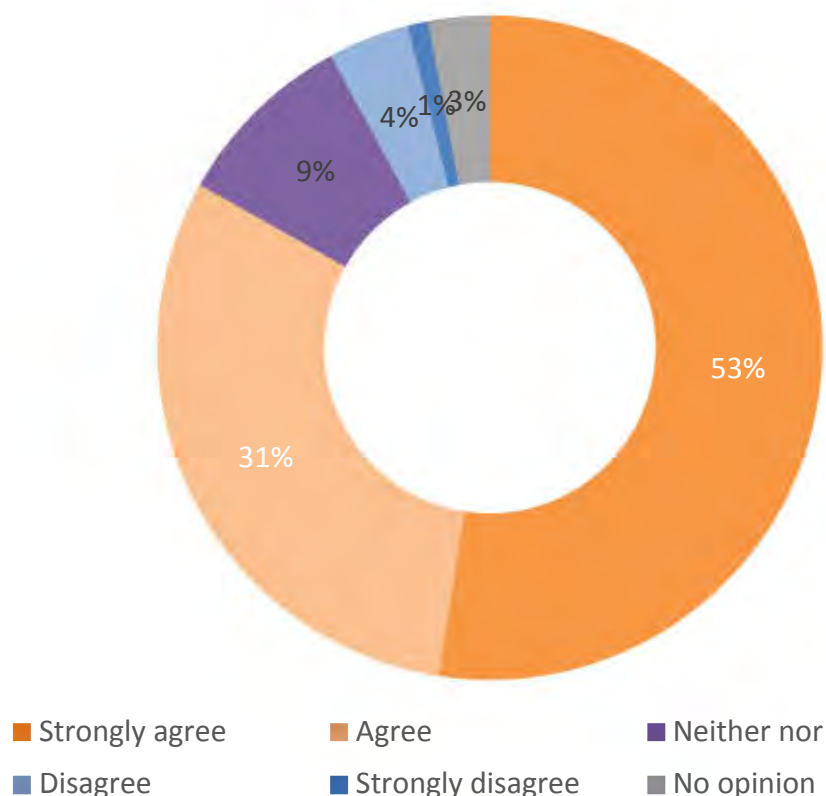


Figure 1. Graph from Colmar Brunton report "Attitudes Towards a Zero Bycatch Goal" (4 July 2017)

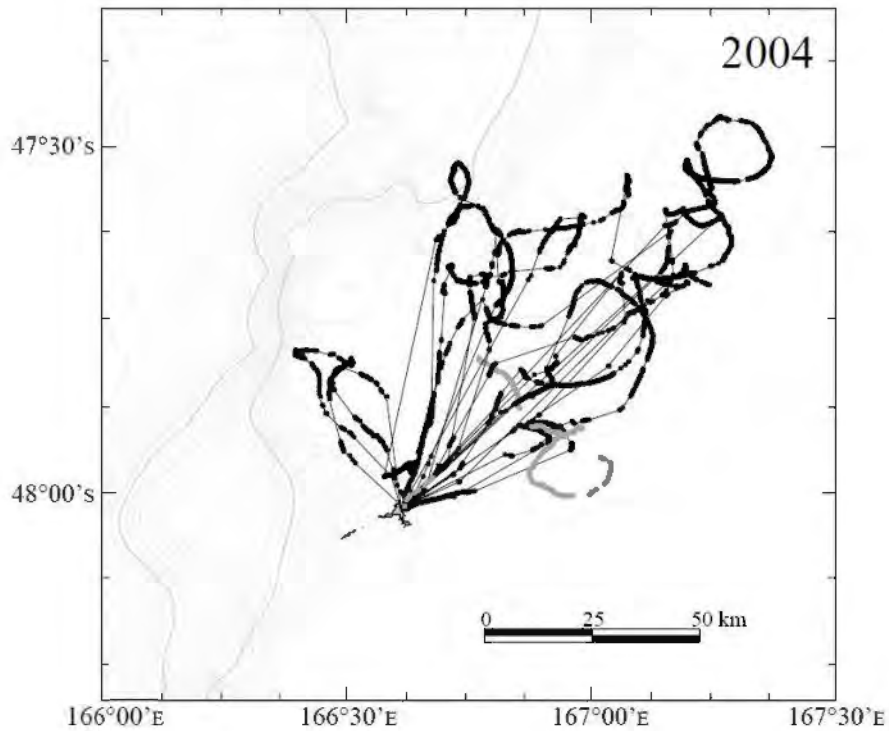
<sup>10</sup> Members of ASCOBANS include: Belgium, Denmark, Finland, France, Germany, Lithuania, Netherlands, Poland, Sweden, UK.

## **2.7 Provide necessary detail, government support and funding to further develop and successfully implement the Strategy**

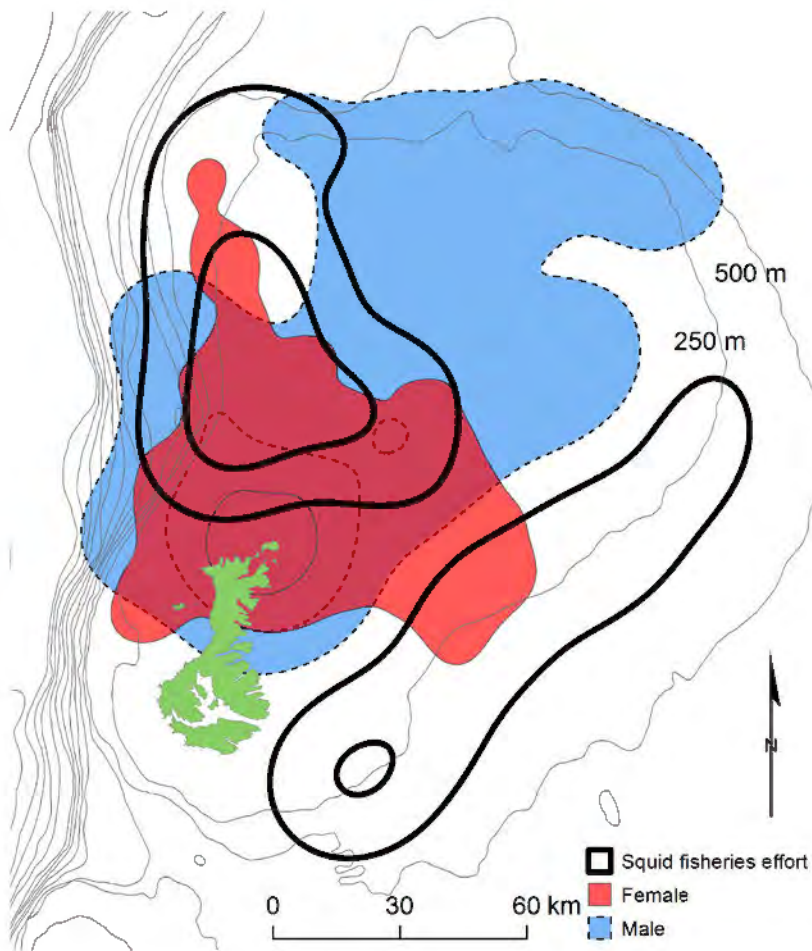
Require collaboration, support and funding from across Government to expand the strategy to include effective protection of marine species, develop detailed pathways to successful implementation of the Strategy – including clearly assigning responsibilities for the work, and establishing milestones to enable monitoring of progress over time.

### 3 Appendix I

Maps of selected wide ranging animals

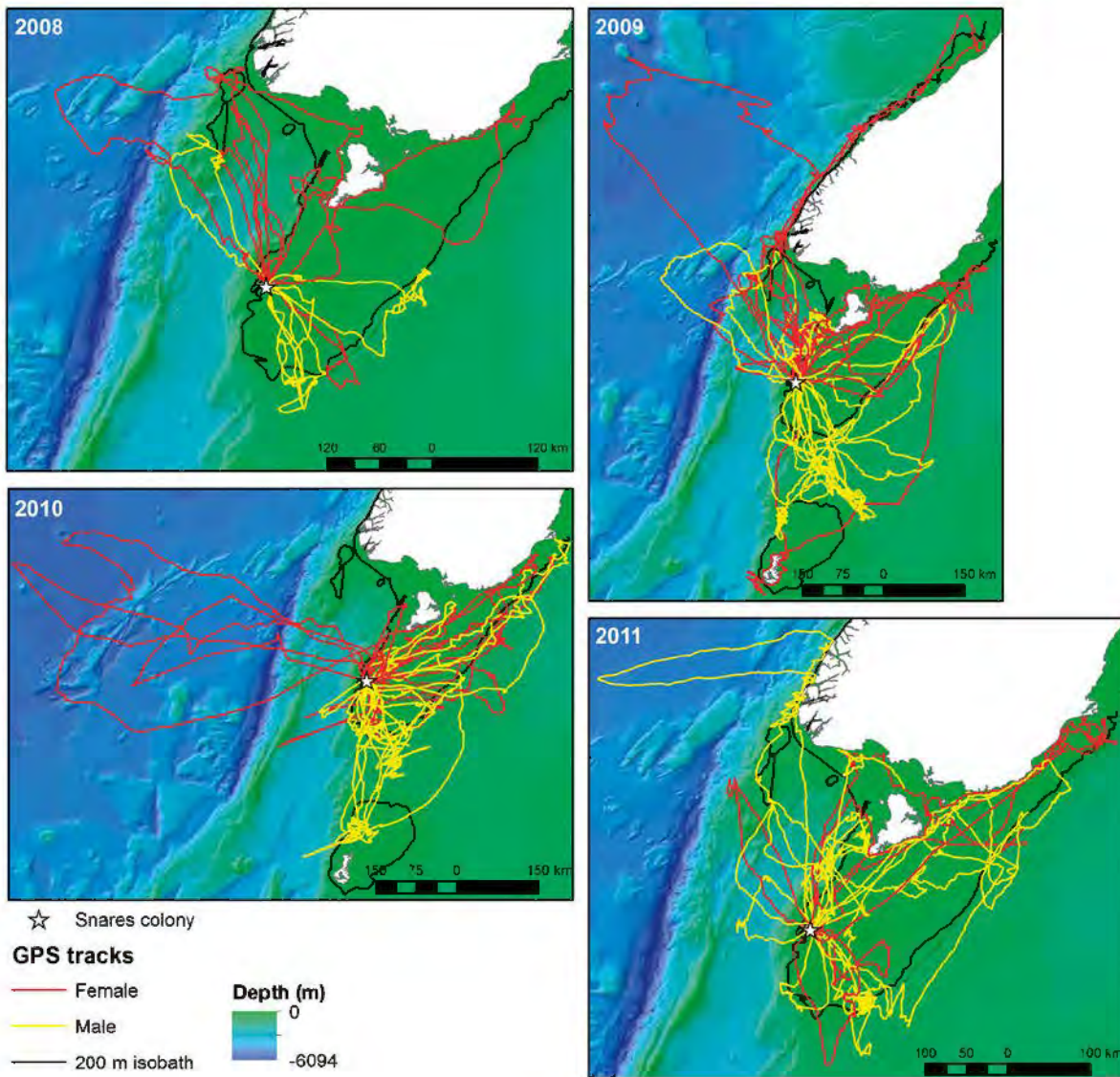


**Map 1. Tracks of female Snares penguins foraging (from Snares Island, South of Stewart Island) during chick-guard 2004 (n=14 birds). (Mattern T. 2006)<sup>i</sup>**

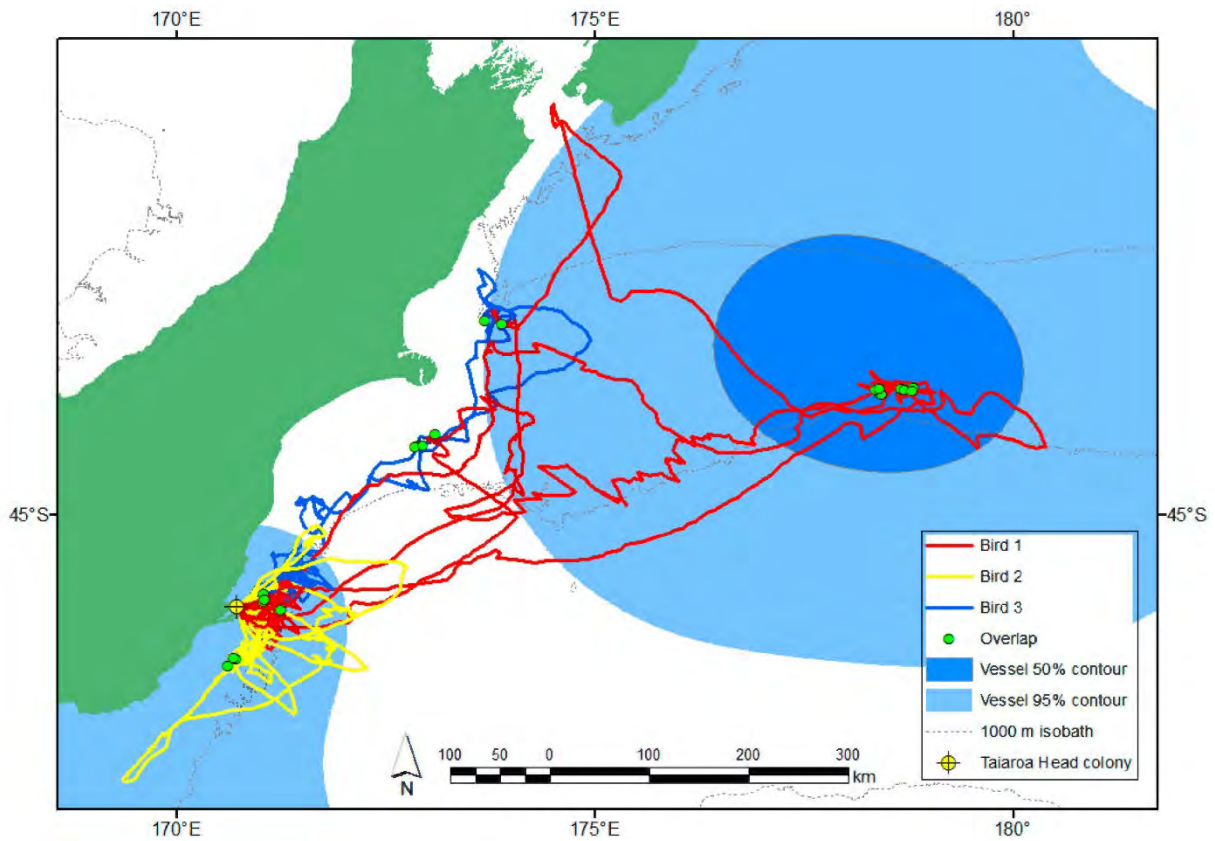


**Map 2. Utilisation distributions of female and male juvenile New Zealand sea lions (*Phocarctos hookeri*) and fisheries.** (Leung et al., 2012)<sup>ii</sup> Bathymetric contours are shown as black lines. The Auckland Island shelf is represented by the 500 m bathymetric boundary.

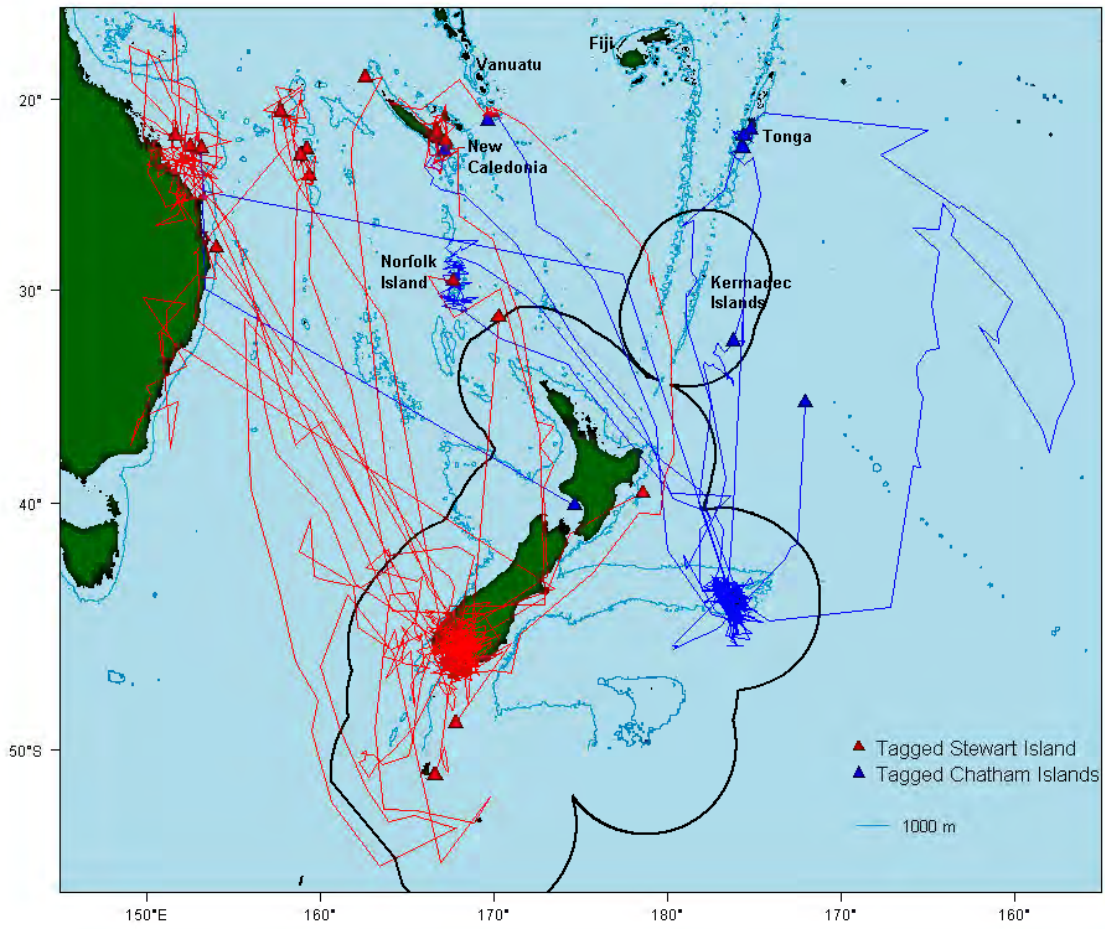




**Map 3. Buller's albatross (*Thalassarche bulleri*) foraging tracks** (Torres et al., 2013)<sup>iii</sup>. .. Tracks of Buller's albatross fitted with GPS loggers in 2008 to 2011, south of New Zealand. All birds were tagged at The Snares. Note that the map scales vary

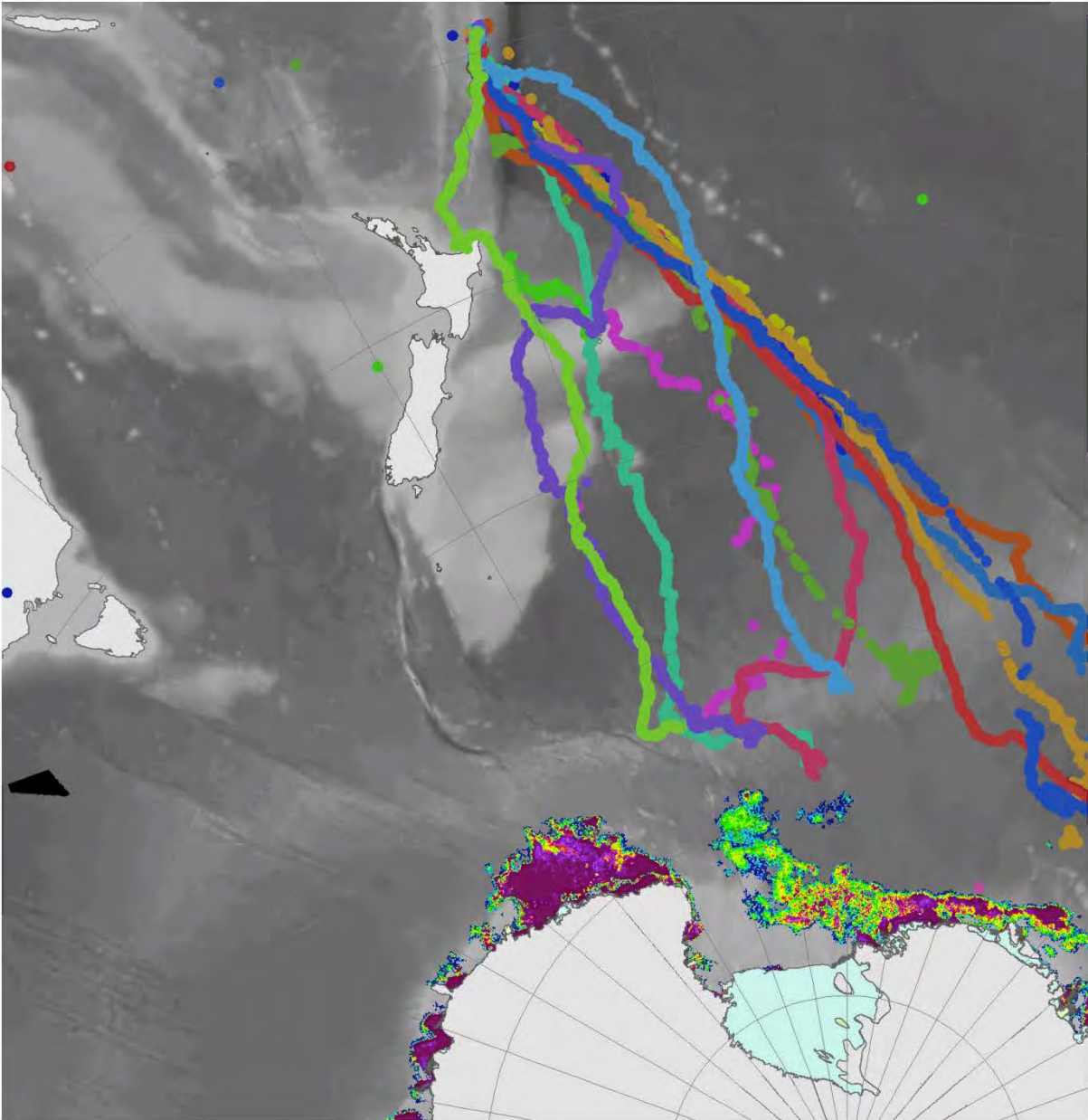


**Map 4. Locations of overlap points derived from Royal albatross GPS tracking and vessel monitoring system (VMS) data.** Tracks are overlaid on the 1000 m isobath and kernel density contours of start locations of fishing events during the same temporal period as when northern royal albatrosses were tracked from Taiaroa Head/Pukekura, New Zealand. Sugishita et al.,(2015)<sup>iv</sup>



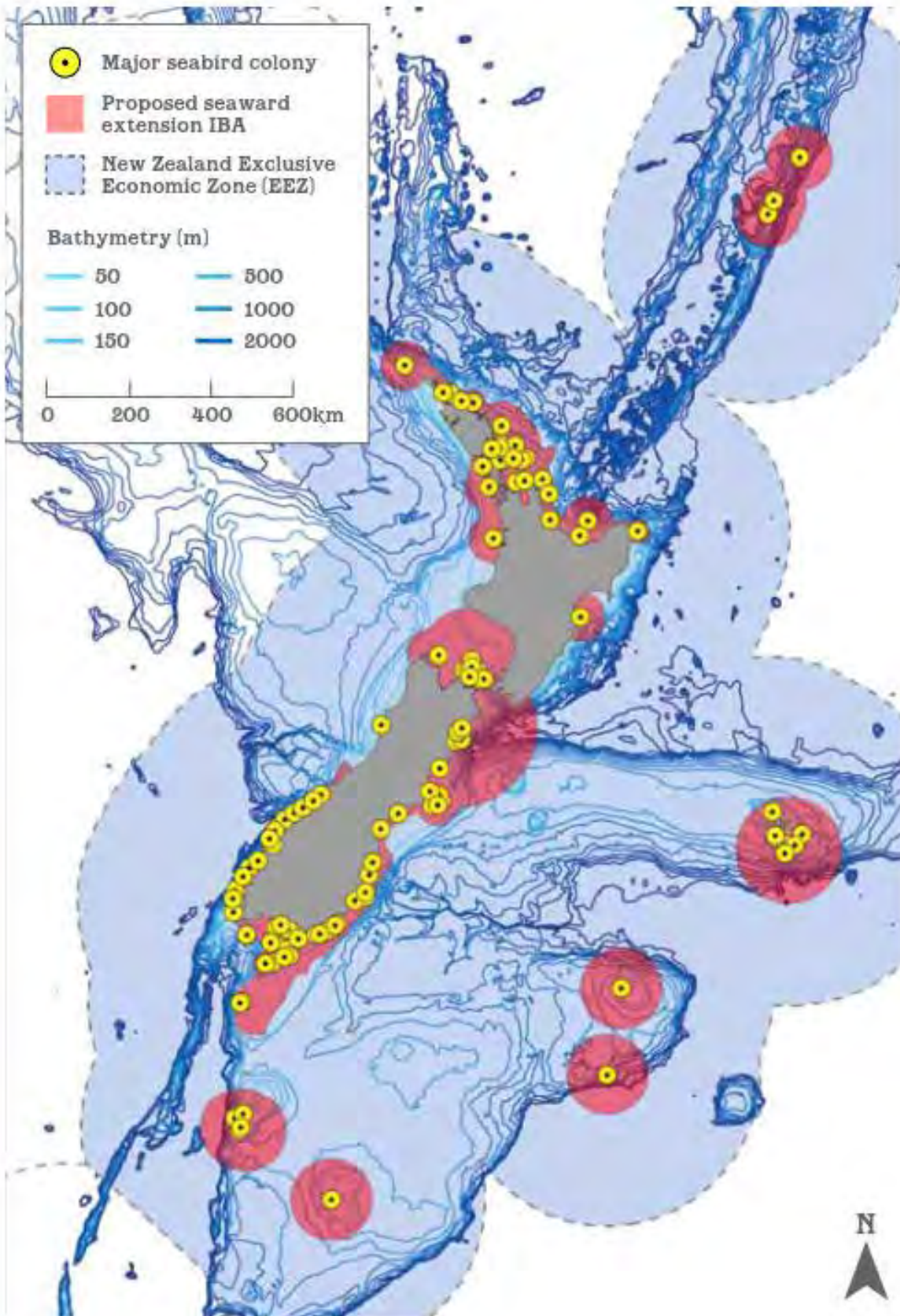
**Map 5. Tracks of great white sharks.** M. Francis (NIWA) and C. Duffy (DOC).

This map shows that New Zealand is an important home base for great white sharks that travel vast distances to neighbouring countries.



**Map 6. The Great Humpback Whale Trail (18/01/2016).** Courtesy of Rochelle Constantine (Auckland University).

This map shows the journey of 12 humpback whales as migrate from Tonga through New Zealand's EEZ to Antarctic Fishing grounds.



**Map 7. Priority areas for sea bird protection in the EEZ.** (Chris Gaskin and Forest & Bird, 2014)<sup>v</sup>

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<sup>i</sup> Mattern T (2006) *Marine ecology of offshore and inshore foraging penguins: the Snares penguin Eudyptes robustus and Yellow-eyed penguin Megadyptes antipodes*. PhD, University of Otago, Dunedin.

<sup>ii</sup> Leung, E. S., Chilvers, B. L., Nakagawa, S., Moore, A. B., & Robertson, B. C. (2012). Sexual segregation in juvenile New Zealand sea lion foraging ranges: implications for intraspecific competition, population dynamics and conservation. *PloS one*, 7(9), e45389.

<sup>iii</sup> Torres, L. G., Sagar, P. M., Thompson, D. R., & Phillips, R. A. (2013). Scaling down the analysis of seabird-fishery interactions. *Marine Ecology Progress Series*, 473, 275-289.

<sup>iv</sup> Sugishita, J., Torres, L. G., & Seddon, P. J. (2015). A new approach to study of seabird-fishery overlap: Connecting chick feeding with parental foraging and overlap with fishing vessels. *Global Ecology and Conservation*, 4, 632-644.

<sup>v</sup> Abraham, Edward, David Agnew, Philippa Agnew, Hilary Aikman, Nick Allen, Ian Angus, Karen Baird et al. "New Zealand Seabirds: Important Bird Areas and Conservation." (2014).

## 4 Appendix II

### 4.1 DoC 2017 Threatened species list

In the 2017 *New Zealand's Threatened Species Strategy (Draft for consultation)* put out by the Department of Conservation there are 150 priority threatened and at risk species identified. Within the 50 'Notable species' there are 11 marine species identified (22%). Within the 100 'Managed threatened and at risk species' there are 6 marine species identified, and three shore species, six and three percent respectively. This results in a total of 9 marine species (9%).

Out of the total list of 150 species there are 17 wholly marine species identified (11.33%), when the three shore species are included there are a total of 20 marine species (13.33%) on the list.

#### Marine species from the 2017 NZ Threatened Species Strategy (draft) DoC report

Common name	species name	NZ conservation level	IUCN level
Bryde's Whale	<i>Balaenoptera edeni brydei</i>	Nationally Critical	Data Deficient
Māui dolphin	<i>Cephalorhynchus hectori maui</i>	Nationally Critical	Critically Endangered
NZ sea lion	<i>Phocarctos hookeri</i>	Nationally Critical	Vulnerable
Hector's dolphin	<i>Cephalorhynchus hectori hectori</i>	Nationally Endangered	Endangered
Bottlenose dolphin	<i>Tursiops truncatus</i>	Nationally Endangered	Data Deficient
Great white shark	<i>Carcharodon carcharias</i>	At risk-Declining	Vulnerable
Bubblegum coral	<i>Paragorgia alisonae</i>	Nationally Vulnerable	Not classified
Yellow-eyed penguin	<i>Megadyptes antipodes</i>	Nationally Vulnerable	Endangered
NZ storm petrel	<i>Fregetta maoriana</i>	Nationally Endangered <sup>11</sup>	Critically Endangered
Chatham Is Taiko	<i>Pterodroma magenta</i>	Nationally Critical	Critically Endangered
Antipodean wandering albatross	<i>Diomedea antipodensis antipodensis</i>	Nationally Critical	(Vulnerable) <sup>8</sup>
Chatham Island oystercatcher	<i>Haematopus chathamensis</i>	Nationally Critical	Endangered <sup>12</sup>
Black-billed gull	<i>Larus bulleri</i>	Nationally Critical	Endangered
Chatham Island shag	<i>Leucocarbo onslowi</i>	Nationally Critical	Endangered
South Georgian diving petrel	<i>Pelecanoides georgicus</i> "Codfish Island"	Nationally Critical	(least concern) <sup>13</sup>
NZ fairy tern	<i>Sternula nereis davisae</i>	Nationally Critical	(vulnerable) <sup>8</sup>
Pitt Is shag	<i>Stictocarbo featherstoni</i>	Nationally Critical	Endangered
Black-fronted tern	<i>Chlidonias albobristatus</i>	Nationally Endangered	Endangered
NZ shore plover	<i>Thinornis novaeseelandiae</i>	Nationally Critical	Endangered
Southern NZ dotterel	<i>Charadrius obscurus obscurus</i>	Nationally Critical	(Endangered) <sup>8</sup>

#### Other Marine species that should/could be considered based on marine species included in DOC threatened species reports<sup>vi</sup>.

Common name	species name	NZ conservation level	IUCN level
Southern right whale	<i>Eubalaena australis</i>	Nationally Vulnerable	Least Concern
Southern elephant seal	<i>Mirounga leonina</i>	Nationally Critical	Least Concern
Killer whale	<i>Orcinus orca</i>	Nationally Critical	Data Deficient
Pygmy blue whale	<i>Balaenoptera musculus brevicauda</i>	Migrant	Data Deficient
Southern/Antarctic blue whale	<i>Balaenoptera musculus intermedia</i>	Migrant	Endangered
Salvin's mollymawk	<i>Thalassarche salvini</i>	Nationally Critical	Vulnerable

<sup>11</sup> Query NZ conservation status – 2017 Threatened Species report notes Nationally Endangered; *Conservation status of NZ birds, 2016*, DOC report states as Nationally Vulnerable

<sup>12</sup> Grey text indicates shore/wading bird

<sup>13</sup> No IUCN red list status for subspecies – IUCN level here is for 'parent' species

Kermadec white-faced storm petrel	<i>Pelagodroma albiclunus</i>	Nationally Critical	Not classified
<b>Common name</b>	<b>species name</b>	<b>NZ conservation level</b>	<b>IUCN level</b>
Gibson's albatross	<i>Diomedea antipodensis gibsoni</i>	Nationally Critical	(Vulnerable) <sup>8</sup>
White tern	<i>Gygis alba candida</i>	Nationally Critical	(Least Concern) <sup>8</sup>
Masked (blue-faced) booby	<i>Sula dactylatra tasmani</i>	Nationally Endangered	(Least Concern) <sup>8</sup>
King shag	<i>Leucocarbo carunculatus</i>	Nationally Endangered	Vulnerable
White-bellied storm petrel	<i>Fregetta grallaria grallaria</i>	Nationally Endangered	(Least Concern) <sup>8</sup>
Eastern rockhopper penguin	<i>Eudyptes filholi</i>	Nationally Vulnerable	Not classified
Fiordland crested penguin	<i>Eudyptes pachyrhynchus</i>	Nationally Vulnerable	Vulnerable
Caspian tern	<i>Hydroprogne caspia</i>	Nationally Vulnerable	Least Concern
Auckland Island shag	<i>Leucocarbo colensoi</i>	Nationally Vulnerable	Vulnerable
Foveaux shag	<i>Leucocarbo stewarti</i>	Nationally Vulnerable	Not classified
Black petrel	<i>Procellaria parkinsoni</i>	Nationally Vulnerable	Vulnerable
Chatham petrel	<i>Pterodroma axillaris</i>	Nationally Vulnerable	Vulnerable
Flesh-footed shearwater	<i>Puffinus carneipes</i>	Nationally Vulnerable	Near Threatened
Hutton's shearwater	<i>Puffinus huttoni</i>	Nationally Vulnerable	Endangered
Southern white-fronted tern	<i>Sterna striata aucklandornia</i>	Nationally Vulnerable	(Least Concern) <sup>8</sup>
Grey-headed mollymawk	<i>Thalassarche chrysostoma</i>	Nationally Vulnerable	Endangered
Campbell Island mollymawk	<i>Thalassarche impavida</i>	Nationally Vulnerable	Vulnerable
Giant spionid worm <sup>14</sup>	<i>Spio aequalis</i>	Nationally Endangered	Not classified
O'shea's tree bryozoan	<i>Calvetia osheai</i>	Nationally Vulnerable	Not classified
Bryozoan	<i>Spiritopora perplexa</i>	Nationally Vulnerable	Not classified
Bamboo coral	<i>Chathamisis bayeri</i>	Nationally Vulnerable	Not classified
Green turtle	<i>Chelonia mydas</i>	Migrant	Endangered
Leatherback turtle	<i>Dermochelys coriacea</i>	Migrant	Vulnerable
Loggerhead turtle	<i>Caretta caretta</i>	Vagrant	Vulnerable
Hawksbill turtle	<i>Eretmochelys imbricata</i>	Vagrant	Critically Endangered
Southern Bluefin tuna	<i>Thunnus maccoyii</i>	<i>not assessed</i>	Critically Endangered
Pacific Bluefin tuna	<i>Thunnus orientalis</i>	<i>not assessed</i>	Vulnerable

<sup>vi</sup> **Conservation status of New Zealand birds, 2016.** Hugh A. Robertson, Karen Baird, John E. Dowding, Graeme P. Elliott, Rodney A. Hitchmough, Colin M. Miskelly, Nikki McArthur, Colin F.J. O'Donnell, Paul M. Sagar, R. Paul Scofield; Graeme A. Taylor. *New Zealand Threat Classification Series 19*. 27 p. ([PDF, 601K](#))

**Conservation status of New Zealand reptiles, 2015.** By Rod Hitchmough, Ben Barr, Marieke Lettink, Jo Monks, James Reardon, Mandy Tocher, Dylan van Winkel and Jeremy Rolfe. *New Zealand Threat Classification Series 17*. 14 p. ([PDF, 550K](#))

**Conservation status of New Zealand marine mammals, 2013.** By C.S. Baker, B.L. Chilvers, S. Childerhouse, R. Constantine, R. Currey, R. Mattlin, A. Van Helden, R. Hitchmough, and J. Rolfe 2016. *New Zealand Threat Classification Series 14*. 18 p. ([PDF, 636K](#))

**Conservation status of New Zealand marine invertebrates, 2013** Debbie Freeman, Kareen Schnabel, Bruce Marshall, Dennis Gordon, Stephen Wing, Di Tracey and Rod Hitchmough 2014. *New Zealand Threat Classification Series 9*. 20 p. ([PDF, 664K](#))

<sup>14</sup> Large beach worm, polychaete, unique to NZ



**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 4:34 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
Organisation: [REDACTED]  
Email: [REDACTED]

q1: No, it fails to adequately address several major threats, including lack of legal protection for our indigenous flora and freshwater fish. This strategy fails to

q2:

q3: No, I am concerned that this strategy is restricted to species designated as Threatened and does not acknowledge the large numbers of At Risk species we have in New Zealand? The table on page 12 is misleading, as it does not show the number of At Risk species compared with Threatened and Data Deficient. For example, our native vascular plants comprise roughly 2,500 taxa. Of these 696 native vascular taxa are ranked as 'At Risk' – when you add this to the number of Threatened taxa this means that of 28% of our native plants are vulnerable.

q4:

q5: Legal tools - we need legal protection for species which do not have it. In addition, why do we have an 'action plan' and not a National Policy Statement on Biodiversity?

q6: I would like to think so. Will there be regular public reporting on how things are progressing?

q7: I think a goal of reducing the harm caused by human activity which affects our threatened species. This includes working with other government agencies which at times encourage the degradation of our environment in favour of economic goals (MPI, MBIE) and working on serious climate change policy, not the soft goals set by this government.

q8:

q9:

q10: Predator Free 2050 is a start, but we need to recognise the serious harm that feral goats, chamois, thar, deer, pigs, hares and rabbits pose to our threatened native flora. Without plant communities we cannot expect our native birds to thrive. As New Zealanders we to have a courageous conversation and decide whether the right to easily shoot an animal for recreation or for the freezer is more important than preserving our unique species. It may be we need to designate some areas for hunting and accept that the native plant communities will become even more degraded while in other areas we aim to protect the full suite of species and here we only tolerate the lowest practicable levels of these pest animals. I see the Strategy mentions deer once, and only to note they are one of the many things which put pressure on our native species. There is no indication in this strategy on what to do about deer and other browsing herbivores.

q11:

q11comments:

q12:

q13:

q14: No.

q15: I acknowledge that working closely with industry is critical to the success of protecting our native species, in particular where the pursuit of wealth can directly cause the demise of threatened species (unsustainable fishing, intensification of land use, mining). In some cases, practices will need to radically change or even cease, while in other cases a change in how industry operates can bring about positive effects. However, I am deeply concerned about the reliance of the private sector to prop up the increasingly undermined and underfunded DOC budget. The use of the private sector to fund conservation can bring benefits but it does not always provide the best conservation outcomes possible. Private funding models often favour charismatic, well-known animals at the expense of less-famous but taxonomically or ecologically significant species. Public-private partnerships are subject to the vagaries of the market and the spare cash available so tend to be short-term. Shorter time frames for projects

do not allow organisations to make the best use of gains and do not provide the certainty needed for ambitious, complex projects nor allow the retention of valuable experienced staff. DOC funding has decreased under this government (excepting the Battle for the Birds campaigns) and this is a shame. We are world leaders in conservation and export our expertise, yet we expect DOC to manage over one third of our land and all of our threatened species on less than \$10 per hectare. I call on this government to properly fund DOC and implement a Nature levy for visitors as proposed by Dr Jan Wright in her recent report on the state of our birds.

# New Zealand's Threatened Species Strategy: submissions for consultation

#151

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

[Redacted]

Organisation name:  
*(if on behalf of an organisation)*

Auckland Zoo

Email:

[Redacted]

Signature:

[Redacted]

*(we accept a typed signature if  
no electronic signature)*

## Submission:

As a prelude to responding to the questions set out in this submissions document, Auckland Zoo would first like to commend the Department of Conservation for producing a draft Threatened Species Strategy and express our appreciation for this consultation period and opportunity to provide feedback on the document.

Our general impression of the document is that it comes across more as a 'Prospectus of current activities' rather than a 'Strategy'. We also feel that the document would benefit from having a clearer and more simplified structure, and would also benefit from having more specific objectives and commitments. We would recommend that a revised version of the document adopts a more logical and intuitive layout that clearly sets out the Department's Vision and Objectives; identifies the initiatives and projects that will help deliver on the objectives and identifies the tools and resources required to deliver the initiatives and projects.

### **1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

No, we feel the Vision as it currently stands is unclear (the Vision statement is not the place for a lot of the current content), not very strong and isn't expressed as a true Vision. Additionally, there are references to goals and targets throughout the document that are not reflected in the overall Vision.

Fundamentally, we'd like to see the Vision portray an ambitious and exciting picture of what Threatened Species Conservation will look like in 2025, which the current vision doesn't do. For example, the current vision could be altered to something like "*All 500 threatened species with manageable threats are under management and those (individuals and agencies) managing threatened species are provided with the necessary resources required to achieve this, including through many and diverse partnerships. There is active research into mitigating threats that are currently conceived unmanageable*".

### **2: Are there additional aspects that you think should be included in the vision?**

Please refer to above.

Additionally, we'd like to see the Vision statement expanded to include a more explicit social aspect (e.g. where communities value species biodiversity and are involved in its protection), affirming that New Zealand's species conservation is a shared responsibility.

We'd like to see some targets around these themes set out in the Vision statement, e.g. there will be zero further species extinctions, the population decline of all threatened species populations will have halted and populations will either be stable or increasing, 80% of native species will have been restored across their former range, where there is habitat to support them and the threat classification status of all threatened native species will have improved.

### **3: Do you agree with the characterisation of the value and current state of our native species?**

On the whole, yes. The conservation status of New Zealand's biodiversity is desperate and in urgent need of further efforts to safeguard it.

However, it would be beneficial to conservation if the taxonomic issues for New Zealand native species were resolved in a timely manner. Currently the document explains that taxonomic groups are being called 'species' when they're actually not species. The constant change in taxonomy and the selective importance placed on varying taxonomic distinctions is not helpful to the various groups working in conservation, especially if everyone is using different taxonomic lists. Species should be formally described for them to actually be considered a species. For example, what are the 15 'species' of native frogs and 106 'species' of native reptiles referred to on page 12 of the document? If we're working to conserve subspecies, varieties etc., that needs to be made explicit so efforts can be prioritised holistically. IUCN Red List categories should also be used to put the status of NZ species in an international context (with priority taxa being globally assessed if they have not yet been, or re-assessed if their current assessment is out of date).

It would also be useful to have some baseline figures presented in terms of the amount (and proportion) of conservation land (and (separately) private land (if figures exist)) currently receiving ongoing pest management (with notes to record which pests are being managed). The cost of these operations should also be presented. These figures provide relatively simple measures for pest control effort. Comparative figures for other Government expenditure would also be helpful – e.g. vote health 2015/16 - \$15.9bn, vote DOC 2015/16 - \$471m (\$187m natural heritage, \$148m recreation).

### **4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

Broadly speaking yes, however mammalian predator and pest plant control are not listed as a tool, although it is presented as the main tool and discussed a lot elsewhere in the document.

We also feel that there should be more explicit mention of the growing importance of partnerships with other organisations committed to the conservation of NZ's wildlife. Organisations that have a complimentary skill-set to that which can be provided by DOC, organisations that will provide additional resources towards the delivery of the objectives within the strategic plan. For example, Auckland Zoo has provided over \$1.9 million in resources and direct financial contributions to DOC programmes/species over the last 5 years and a further \$3.5million towards other non-DOC NZ wildlife conservation initiatives over the same period.

### **5: Are there other tools we could use to help us achieve the vision?**

- Wildlife disease risk assessment and management
- Islands and un-fenced sanctuaries

- Indirect tools, such as encouraging public to value wildlife and wild places, advocacy, and education
- International partnerships (for expertise and funding opportunities)

## **6: Will the proposed goals help us achieve the vision and assess our progress?**

The goals section starts off encouragingly by stating 'setting clear goals for threatened species provides focus and a sense of urgency'. However, unfortunately the goals that follow don't match this headline statement and were found to be unclear and confusing. While it is likely that the goals that are listed will help achieve the vision, the goals themselves could be significantly improved.

We'd like to see SMART goals that pin-down some real milestones included in the goals section. We'd prefer that it was clearly stated that protection (for the "long term survival" of a species) was simply avoidance of extinction – and might be achieved even if a species had been lost from 99% of its former range.

## **7: Are there alternative goals that you think will better achieve the vision and assess our progress?**

As discussed above, it would be good to see the document contain clearer, stepwise goals that relate to objectives and allow progress to be measured against the end goal. What does success look like?

We would also favour a specific goal around increasing the resources, both public and private, that are directed toward protection of threatened species.

## **8: Have we identified the right strategic themes?**

Yes, the themes are excellent. It would be good to see the document set out how the themes relate to the goals, tools etc. At the moment, the document is very fragmented and it is not easy to follow. Neither is it obvious what difference this document is going to make to the current conservation operations and actions already in progress.

## **9: Do you agree with our top 10 actions?**

Again, we feel the main issue with the actions section is its structure and detachment from the rest of the document. We would like to see the actions relating directly to the goals and objectives. For example, the Predator Free 2050 goals referred to in the Top 10 actions are not referred to in the document's own goals.

We'd like to see some targets on the actions and for them to be SMART. For example: Action 8, is currently 'Select 500 data deficient species to focus researchers on further scientific work', this could be strengthened by altering it to something like 'Compile a

prioritised list of 500 data deficient species to focus scientific research and have enough data on at least an additional 100 species sufficient to assess them outside of Data Deficient by 2025'.

Action 3 could be 'Publish a prioritised list of threatened plants, and protect at least 25% of them by *in situ* management and/or secure seed storage by 2025'.

**10: Are there any other actions that should be included, and any actions that should be removed?**

There are lots of tools in the "Tools" section that won't be utilised for the current Top 10 actions, e.g. none of the Top 10 actions refer to the use of intensive management, translocations or advocacy or encouraging community involvement.

We would also like to see an action focused around empowering / supporting partners to contribute to conservation.

**11: Have we identified the right number of priority species?**

(Circle or highlight one) • Too many • About right • Too few

**Comments:**

**12: Have we identified the right priority species?**

We would like to see the 357 species currently managed set out in a 'Managed species list' and then a prioritised list of the additional 143 unmanaged species, to be managed by 2025 (in order to meet target of 500 species). The Managed species list would also identify which of these 357 species are being managed for *protection* and clarify what this means (e.g. sufficient management to avoid extinction or managed to halt further population declines and range restrictions?). It would also be useful if the document specified that this will still leave at least 300+ threatened species unmanaged by 2025.

**13: Do you think other species should be prioritised ahead of the ones listed? And why?**

We think all species should be considered equal and would like to see the concept of 'notable species' dropped from the document. Why focus on so many kiwi species when there are more threatened (but less charismatic) species? If the 'notable species' list remains, it seems illogical that species such as North Island brown kiwi, kokako and tieke which all number in the thousands and are (at least for kokako and tieke) on an upward trajectory would make the notable list but orange-fronted kakariki (probably around 300 birds and still declining in all likelihood) is not. There are likely to be many other such inconsistencies which is why we would advocate for the 'notable' distinction to be removed.

Additionally, we think it would be appropriate to include Maori names in the species list.

**14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

An immense amount of work has been put into producing the draft Threatened Species Strategy, however, as expressed throughout this submission, we think the document is confusing in structure and outcomes and would encourage the Department of Conservation to consider using the IUCN Conservation Planning Specialist Group (an international conservation planning organisation) to re-frame the document as a strategic plan that is precise, accurate, ambitious and accountable.

**15: Do you have any further comments regarding the draft Strategy that is not covered above?**

There seems to be too much emphasis on the predator free 2050 target species (rats, possums, stoats) and very little mention of the other threats that are briefly mentioned on page 10 but not elsewhere. DOC also needs to show leadership around the management of exotic pests/predators that are valued by certain sections of society (e.g. deer, domestic cats and dogs, salmonids) but that pose a threat to native species, and this strategy should be used to do this.

While we feel that there is significant room for improvement with the current strategy document, we applaud the department for producing, and seeking public comment on, the draft Threatened Species Strategy. It goes some way toward transparently summarising and documenting the Department's strategy for threatened species work and could become a very useful reference point for both the Department itself and the New Zealand public.



RE - Consultation on the *draft NEW zealand's threatened species strategy*: key issues

To whom this may concern

### PURPOSE

- To support Ngati Kuaia and it's Taiao aspirations as members of the Iwi Chairs Forum to consider key issues on the Department of Conservation's ("the Department") recent *Draft New Zealand's Threatened Species Strategy ("TSS")*, in the development of submissions to be lodged by 31 July 2017.
- To identify a number of key issues in this submissions on the draft TSS.
- To identify opportunities which could be included in the development of Ngati Kuaia and Ngati Apa ki te ra to positions on those issues.

### 1. BACKGROUND

- The Department of Conservation is the lead agency for managing threatened species across our landscapes, waterways and oceans. This management responsibility is implemented through various mechanisms including species recovery plans, species recovery groups and a number of direct interventions through national and regional work programmes such as pest and weed control.
- Some iwi have been involved in a number of these processes and operational projects. This includes through various Settlement mechanisms and local arrangements between iwi and the Department. These mechanisms often provide statutory and formal protection of the local relationship with taonga species through input into species recovery processes and programmes.
- Recently there has been a push by the Department, with the support of Government, to develop large scale programmes and associated ambitious future goals. This is an attempt to implement a landscape scale approach to the management of threatened species and halt their decline.
- Ngati Kuaia were one of the few iwi who submitted to Doc and engaged with officials on our issues. The species below were discussed but Ngati Kuaia have concerns for all species, wheather identified as threatened or not!

Ngati Kuaia toanga species

### Resource Management Unit

19 Kinross Street, PO Box 1046, Blenheim 7201  
(03) 579 4238 Office  
027 253 5043 Mobile

raymond@ngatikuia.iwi.nz



- Te Kawau – Ngati Kuia have specific concerns relating to Te Kawau a toru and the special relationship this species has with Ngati Kuia and the adverse affects from increased intensive aquaculture activities in Te Hoiere, Marlborough Sounds. We would like to see this species elevated in the list
- Titi – This taonga species is on the outer limits of it's range and is considered under pressure from activities such as commercial fishing.
- Karearea - forestry activities have been identified as an activity that
- Weka – Ngati Kuia traditional practices have been maintained with weka and we would like to see access arrangements for kohikai. Ngati Kuia has seen abundance change from predation of Rats, stoats and possums. There is also relocation ie Te Hoiere to Able Tasman National Park project.
- Aihe – this toanga species is part of our identity and some species are the most threatened in the world
- Powelliphanta and any other insect that is predated to the point of extinction, small pockets such as "Howdens Bush" Punruawhiti must be protected
- Ngarara such as Tuatara, skinks, brown lizards & Pakeka/Maude Island frogs are
- Sealife of all sorts must be coming under pressure in light of the new MFE and DoC reports on the State of our Marine environment

For Ngati Kuia all species are interrelated to some degree and are integral to the maintenance of a diverse ecosystem. Characterizing species in a list of threatened is difficult to understand

Ngati Apa ki te ra to taonga manu species identified with the Alpine lakes rohe but are not aware of their status

[Great Spotted Kiwi](#)

[Great Black Shag](#)

[Blue Duck](#)

[New Zealand Falcon](#)

[Banded Rail](#)

[Weka](#)

[Pukeko](#)

[New Zealand Dotterel](#)

[New Zealand pigeon](#)

[Kaka](#)

[Kea](#)

[Yellow-crowned Kakariki](#)

*Apteryx haastii*

*Phalacrocorax carbo*

*Hymenolaimus malacorhynchos*

*Falco novaeseelandiae*

*Rallus philippensis.*

*Gallirallus australis greyi*

*Porphyrio porphyrio melanotus*

*Charadrius obscurus obscurus*

*Hemiphaga novaeseelandiae*

*Nestor meridionalis*

*Nestor notabilis*

*Cyanoramphus auriceps*

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The cuckoos migrate from the Pacific Islands, arriving in New Zealand from around September and leaving again around March.

[Morepork](#)

[Kingfisher](#)

[Tomtit](#)

[Robin](#)

[Welcome Swallow](#)

[Bellbird](#)

[Tui](#)

[Fantail](#)

[New Zealand Pipit](#)

[Yellowhead](#)

[Rifleman](#)

*Ninox novaeseelandiae*

*Halcyon sancta*

*Petroica macrocephala*

*Petroica australis*

*Hirundo tahitica neoxena*

*Anthornis melanura*

*Prosthemadera novaeseelandiae*

*Rhipidura fuliginosa*

*Anthus novaeseelandiae*

*Mohoua ochrocephala*

*Acanthisitta chloris*

Ngāti Apa also have taonga species in mammal, insects, reptiles & Flora

At this stage, our collective's are developing key environmental positions for our post settlement governance entity to consider adopting to IMP's. All species are interrelated to some degree and are integral to the maintenance of a diverse ecosystem.

IAG – Ngāti Kūia have supported the great work done by the Conservation IAG to date

- The 'Purpose' of the TSS is a positive and meaningful aspiration and generally well-articulated within the Strategy. However the TSS does not stretch the concept of what a Strategy/Strategic approach could attempt to do for iwi. It is more a description of current management actions, that it is hoped will grow in their extent and effect.
- While there is nothing startlingly new in the TSS there is a positive continued commitment and drive for a national citizenry approach including greater business and technological solutions. This reflects the Department's realistic understanding of what is achievable with current Government funding but should not devalue or reduce support for the Treaty partnership.
- There is a commitment made in the Strategy Goal 3 to:

*'Integrate Te Ao Māori and mātauranga Māori into species recovery programmes'*

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**NGĀTI KUIA**  
Te Iwi Pakohe

## Resource Management Unit

[www.ngatikua.iwi.nz](http://www.ngatikua.iwi.nz)

In order to achieve this commitment in Goal 3, iwi must be supported to determine the nature of this commitment and how these elements are integrated into the Government's effort to deliver this Strategy. It is important to ensure the Department's commitment to meet this embedded obligation is fulfilled in partnership.

### Summary

Ngāti Kūia and Ngāti Apa look forward to fully utilizing our customary rights with our Treaty settlements. We also express our unyielding desire to be owners of our taonga.

We support the ongoing work by IAG conservation in the stream

X

Raymond Smith  
Taiao manager

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# New Zealand's Threatened Species Strategy: submissions for consultation

#153

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter or contact person:	Lynn Anderson Chief Executive
Organisation name: <i>(if on behalf of an organisation)</i>	Orana Wildlife Park
Email:	[REDACTED]
Signature:	[REDACTED]

*(we accept a typed signature if no electronic signature)*



## Submission:

Having had input in the Zoo and Aquarium Association New Zealand (ZAA NZ) Submission, I would like to express my support for the submission on behalf of Orana Wildlife Park.

### You can answer all or some of the questions.

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

*On the whole, yes it does. There appears to be a diverse focus and we applaud the inclusion of a species list.*

2: Are there additional aspects that you think should be included in the vision?

*We think that the survival of species requires international links as well and that NZ could utilise these for better outcomes.*

3: Do you agree with the characterisation of the value and current state of our native species?

*Yes. The effort required is immense and all partners must be included.*

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

*We would like to see the section here titled “captive management” on page 20 changed to ‘A Partnership with the Zoos, Wildlife Parks and Aquariums to better reflect the MOU which is in place, similar to Botanic Gardens which is headed similarly on page 21. Zoos and aquariums contribute significantly to species recovery, through breed for release programmes, Operation Nest Egg, veterinary assistance, research (e.g. Kea trap testing), genetic analysis (e.g. with Kiwi released into sanctuaries) and provide education to over 2 million people per annum. Given this significant contribution, we believe that a “Spotlight” should be included within the document to highlight our significant collective and collaborative work in the interests of species recovery.*

5: Are there other tools we could use to help us achieve the vision?

*Yes the One Plan approach from the IUCN Conservation Planning Specialist Group should be considered. This approach is used globally by the Species Survival Commissions of the IUCN. CPSG has an office located at Auckland Zoo.*

6: Will the proposed goals help us achieve the vision and assess our progress?

*They will assist but DOC needs to utilise all partners and stakeholders according to their specialist skill sets. For example, ZAA members are specialists in husbandry, conservation breeding, species management etc and this should be reflected in the strategy. It seems that breeding for restoration is still not seen as a major contributor to species survival and we would like this to be highlighted more.*

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

No.

8: Have we identified the right strategic themes?

Yes.

9: Do you agree with our top 10 actions?

Yes.

10: Are there any other actions that should be included, and any actions that should be removed?

*Advocacy for species protection should be included. The whole community needs to understand the way they can help – it's not going to be all down to the scientists and government officials to save our species. New Zealanders need to be part of the conversation. Zoos, wildlife parks and aquariums can help with this given that we see over 2 million visitors each year in NZ.*

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • **About right** • Too few

### Comments:

12: Have we identified the right priority species?

*At this time yes.*

13: Do you think other species should be prioritised ahead of the ones listed? And why?

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

*Yes, as long as the implementation phase is well organised and all players consulted. Working together in partnership on page 39 needs to go beyond community to those organisations which can add value to the science/ knowledge needed and undertake some actions required. This is especially true in the top 10 actions area.*

15: Do you have any further comments regarding the draft Strategy that is not covered above?

*One area which it totally ignored is the role of veterinary science and veterinary research in understanding the issues occurring in the environment. This is a major contributor to species survival, science and knowledge base (page 35) and can assist with DOC research and understanding of strategic priority interventions. For example, sea bird cases, lead toxicity cases and parrot veterinary cases.*





**From:** [Redacted]  
**Sent:** Monday, 31 July 2017 4:48 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [Redacted]  
Organisation:  
Email: [Redacted]

- q1: no
- q2: yes
- q3: no all of it
- q4: no
- q5: yes
- q6:
- q7: yes, bounty on "pests" get the public involved - especially in the readily accessible areas
- q8: i don't think so
- q9: not all
- q10: aerial poisoning is not the answer its fail for the last 50 years
- q11: aboutright
- q11comments:
- q12: yes
- q13: no
- q14: no
- q15: no

# New Zealand's Threatened Species Strategy: submissions for consultation

#155

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
(if on behalf of an organisation)

Email:

Signature  
(we accept a typed signature if  
no electronic signature)

31<sup>st</sup> July 2017



**Submission:**

You can answer all or some of the questions.

**1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

*No – This vision lacks ambition when it comes to protecting our threatened and at risk native species.*

*To achieve this, the Strategy's vision needs to be much more ambitious than just aiming to safeguard 20% of our threatened species by 2030.*

**2. Are there additional aspects that you think should be included in the vision?**

Yes

- *the need to halt the loss of habitats that support threatened species*
- *Increased emphasis on improving our knowledge of the threats to, and conservation status of, species.*
- *Actions for threatened marine species.*

**3. Do you agree with the characterisation of the value and current state of our native species?**

*Yes I Agree with the value of our biodiversity.*

**4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

*The Strategy places too much emphasis on the need to prioritise the work between threatened species. This emphasis appears to be driven by the lack of resources, rather than conservation need. All threatened and conservation dependent species need to be managed for protection and there needs to be flexibility to be able to work on species that may not have been prioritised, but where an opportunity or a necessity arises.*

*Captive management should only ever be a last resort tool, as the priority for threatened species must be conservation in their natural habitats*

**5. Are there other tools we could use to help us achieve the vision?**

*The best possible tool is to ensure that the Department of Conservation is adequately funded to undertake all the steps necessary to restore all species at risk of extinction and to prevent others from becoming threatened.*

**6. Will the proposed goals help us achieve the vision and assess our progress?**

*No, the proposed goals need to be considerably more ambitious.*

*There are no goals to achieve enhancing all of our threatened and at risk species, or increasing knowledge about the many data deficient species so that no species are data deficient.*

**7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

Yes,

- *Manage all threatened species requiring conservation intervention for protection so that no species should become more threatened*
- *All threatened and conservation dependent species should be actively managed for recovery by 2030.*

**8. Have we identified the right strategic themes?**

*The following additional theme should be included:*

- *Uniting all Government Agencies in an “all of government” response to threatened and at risk species to ensure all native species thrive.*

**9. Do you agree with our top 10 actions? -**

*Yes with additions as detailed below.*

**10 Are there any other actions that should be included, and any actions that should be removed?**

*In addition to achieving the Predator Free 2025 goals and the Battle for our Birds, increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control.*

*Introduce regulations to achieve zero bycatch of threatened species in fisheries.*

*Expand the War on Weeds to include lupins, broom and willow on river beds and their margins*

**11. Have we identified the right number of priority species?**

(Circle or highlight one) • Too many • About right • **Too few**

**Comments:**

*The priority list of threatened species must be based on the conservation needs of all species rather than fitting the prioritisation to the current lack of resources.*

**12. Have we identified the right priority species?**

**No**

*All the threatened species and those that are at risk must be prioritised.*

**13. Do you think other species should be prioritised ahead of the ones listed? And why?**

*Prioritisation should be dependent upon threat status, with account taken of the imminence of threats and be less influenced by the cost of managing them.*

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

*The vision lacks ambition to conserve NZ's threatened species. It only proposes to increase the populations of 150 out of 800 threatened species at risk of extinction, and manage 600 out of a further 2,200 species at risk of decline. The vast majority of threatened and at risk populations which need help now are not covered by the Strategy's proposals for action.*

*Additionally the Strategy fails to commit all government agencies to commit to achieve the strategy's goals.*

# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420  
Wellington 6143 or email to: [HYPERLINK  
"../../../../ygan/AppData/Local/Microsoft/Windows/ygan/Downloads/threatenedspeciesstrategy@doc.govt.n  
z"threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter or contact person:	[REDACTED]
Organisation name: <i>(if on behalf of an organisation)</i>	
Email:	[REDACTED]
Signature: <i>(we accept a typed signature if no electronic signature)</i>	[REDACTED]

## Submission:

**You can answer all or some of the questions.**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

Definitely not! It's a nice try, but it's not ambitious enough and doesn't look after enough of our threatened species soon enough. We seriously risk losing species if we delay any longer than 2025 for some of the species not covered by this strategy.

I would like to see all threatened and at risk species protected - at present only 20% will be. Not good enough.

2: Are there additional aspects that you think should be included in the vision?

Yes please. Please include the marine environment when looking at threatened species - maui's and hector's dolphins, sealions, sea birds and more that need protection too.

3: Do you agree with the characterisation of the value and current state of our native species?

Yes. However, the impact of commercial harvest of whitebait and long-fin eels (which just shouldn't even be allowed!) isn't acknowledged to the extent of damage that it causes.

Also the continuation of habitat clearance, intensification of farming, urban sprawl and infrastructure - especially roads and motorways - isn't recognised either.

4: Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?

Too much emphasis on prioritisation of threatened species. Please, we need to protect them all. I know it sounds overwhelming, but I believe people in NZ really want to support DOC in this vision and you just need to take a leap of faith and do it. We will support you, especially if you take a strong leadership role in this.

5: Are there other tools we could use to help us achieve the vision?

Support greater use of legislation, regulation and policies to ensure that human actions do not further threaten species. For example - zero by catch of threatened species in the fishing industry, no clearance of threatened species habitats.

6: Will the proposed goals help us achieve the vision and assess our progress?

Not really. How are you going to gather data for the species that have no data, or are data deficient?

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

Amend the goals to include:

Enhance the populations of more than 50% of our threatened species so that they are on the road to recovery by 2025,

Manage all threatened species requiring conservation intervention for protection so that no species should become more threatened

All threatened and conservation dependent species should be actively managed for recovery by 2030.

Reduce by kill of threatened species to ensure recovery to non threatened status

Select 230 data deficient species every year so that by 2030 there are no data deficient species.

8: Have we identified the right strategic themes?

It would be better if all of Government Agencies were involved, not just the Ministry of Conservation. Need to bring in all of the agencies.

9: Do you agree with our top 10 actions?

10: Are there any other actions that should be included, and any actions that should be removed?

All of public conservation land needs sustained predator control, not just parts of it.

Amend Action 7 to; Develop and publish a portfolio of priority areas for threatened species protection on private land.

Amend Action 8 to select 1000 rather than 500 of the 3000 data deficient species for assessment.

Amend Action 9 to ensure that national recovery planning systems are not only fit for purpose but are also timely and implemented to achieve threatened species goals.

Add to Action 10 the development of a system for monitoring and regular public reporting on progress towards the goals.

Introduce regulations to achieve zero bycatch of threatened species in fisheries.

Expand the War on Weeds to include lupins, broom and willow on river beds and their margins

Add an action to identify and take opportunities to preferably purchase, or covenant habitats of threatened species.

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right • Too few

Way too few

**Comments:**



12: Have we identified the right priority species?

No, all threatened species, including those at risk and conservation dependent should be prioritised for enhancement by 2030.

13: Do you think other species should be prioritised ahead of the ones listed? And why?

Prioritisation should be dependent upon the threat status of the species, with account taken of the imminence of threats and less influenced by the cost of management.

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

Sorry, but it appears that this vision is lacking in ambition.

The vision, and consequent framework only proposes to increase the populations of 150 out of 800 threatened species at risk of extinction, and manage 600 out of a further 2,200 species at risk of decline. The vast majority of threatened and at risk populations which need help now are not covered by the Strategy's proposals for action.

The strategy focuses on terrestrial species, relying heavily on Predator Free NZ, Battle for our Birds and the limited War on weeds. There is a disappointing lack of focus on out shore and seabirds which are also facing significant threats or marine and freshwater species generally.

It fails to commit all government agencies to do their bit to meet the strategy's goals, especially for marine species, or commit the government to ensure that all of the public conservation lands needing predator control are under regular sustained predator control, and that there are effective policies and actions to protect threatened species on private land.

15: Do you have any further comments regarding the draft Strategy that is not covered above?

I value so much the work that DOC does and DOC seriously needs more funding from the government. Thank you for the opportunity to submit.

--	--

**New Zealand's Threatened Species Strategy - draft**  
**Submission by Wellington Branch**  
**Royal Forest and Bird Protection Society of New Zealand Inc.**

Forest & Bird's mission is to take all reasonable steps within its power to preserve and protect the indigenous fauna and flora and natural features of New Zealand and in doing so take full account of their intrinsic values and benefits to communities and future generations.

Forest & Bird is New Zealand's largest independent environmental voice and is represented by a nation-wide network of branches. The Wellington Branch has around 1,700 members. Its many initiatives enjoy levels of volunteer and community support beyond branch membership.

We engage with our City and Regional Councils to achieve good outcomes that preserve our remnant flora; enhance Wellington's endemic biodiversity; promote ecological connectivity; improve the health of waterways and harbour. Our members were instrumental in the establishment of Zealandia and we are active with other high profile projects.

New Zealand's Threatened Species Strategy draft document is welcome and we are pleased to have the opportunity to contribute to its development. As a general comment we feel it would benefit from a description and illustration of how the component parts described in the text form a coherent strategy.

Our submission addresses:

- The role of legislation and that of Government.
- The scope and consistency of content
- Inclusion of other primary causes of species decline
- Resourcing and research
- The tools and rationale used to guide decisions and resources
- Influence and involvement

The scale of the biodiversity loss that we are experiencing and its consequences cannot be overstated; we are in crisis, and stating [page 32] that 'New Zealand has a well-deserved, global reputation for rescuing threatened species...' is recognition that the country has failed in its international obligations to protect its unique species. The reputation is in fact a recognition of the expertise and dedication of a few individuals. The Director-General in his introduction makes a more appropriate observation about the country's reputation by saying "we have one of the worst rates of extinctions in the world due to introduced predators and habitat loss. And right now, hundreds of our native species face the risk of extinction". He also states that "when 2050 comes, we want to be there with all our native species, not just a fortunate, charismatic few".

We fully endorse this sentiment however it is clear that much of the effort and resources that is required to achieve this objective will not be undertaken by Department of Conservation (DoC). The Director-General observes that "partnerships are the key – this is a fight that DoC and other government agencies can't win alone", however we assert that government policy and funding does have a significant impact on the outcome and is a major driver of structural change. To achieve a reversal in species decline the strategy must influence government policy and be at the core of government thinking. It needs to be a 'whole of government' strategy across all government departments. The Ministry for Primary Industries and the Ministry for Business Innovation and Employment must have this strategy as a core component of their mission. In addition, the strategy would gain impetus if it were an 'active document' with a requirement for the Director-General to report progress every two years.

Legislation [mentioned in the text] is intended to protect and prevent the collapse of our natural heritage. It is evident that these measures have been ineffective. We contend that the path to recovery must also include a strategic purpose in the document for a review of these statutory processes and identify changes that will benefit wildlife recovery including the Māori concept of rāhui. Crown land currently categorised as stewardship land should form part of this review and be given greater legal protection where it is of conservation value to species diversity and survival.

The document talks of riding the wave of public enthusiasm [page 2] for Predator Free 2050. This is fine, however the goals of Predator Free 2050 Ltd are restricted to the suppression of rat, stoat and possum numbers and the creation of areas free of these pests which undoubtedly will assist the survival of some of our wildlife. The strategy document however does not direct Predator Free 2050 Ltd [page 3] so we are unclear how it will influence Predator Free 2050 Ltd decisions.

There are many other causes of species decline [acknowledged in the document] but little discussion on how the strategy will reduce, reverse or mitigate them, specifically habitat loss; climate change; exploitation; browsers other than possum e.g. goat, hare, deer; weeds, are significant drivers of species decline and extinction. We feel that if the strategy included sections on each of these topics and how they are to be addressed it would have greater value to the

Board of Predator Free 2050 Ltd, other agencies and the wider community.

The constraints on DoC are clear and without a change in policy, focus and resources we fear there will be no change in the number of species that fall into the category of serious decline; priorities have to change. The methodology used to create the notable species list we suspect is a tool for selecting species for special attention within current constraints; we would like to see the process fully described [in the appendices] to aid understanding and permit expert critique of its validity within the context of this strategy. Our concern is that it is mechanistic in its approach; akin to 'picking winners'. We are however encouraged by the inclusion of "managing ecosystems at scale" [page 32] and agree with the holistic approach and respect DoC's ability to use its knowledge and expertise to achieve the greatest benefit to other species (by default) within its limited resources.

New Zealand's climatic and geologic make-up has created a diversity of ecosystems categorised by EMU's as ecosystem *types*. What is not clear is whether the spatial planning [page 35] and the prioritisation approach will assist diversity within ecosystem types and within species and across regions; an explanation would be useful. We would like to be assured that this methodology will work for naturally rare species and that management plans are tailored to the needs of each ecosystem. Also that these plans take account of climate change and the need for ecological corridors.

We do question whether using an economic and science based approach for the optimised prioritisation model will deliver long term value for species diversity and survival. It implies greater focus on a smaller number of sites with the potential for further rationalisation over time. The approach discusses species as a commodity in a national context, evident in the language of species priorities and reference to representative species and ecosystems, if not explicitly stated, it is in effect permitting selective extinction by design. A view reinforced by the statement [page 31] "... that conservation needs to go beyond focusing on those species that are popular and appealing. *On the other hand, conservation is about delivering on what is important to people.* Social science research into attitudes to species protection gives us insights into the species we value..." The kākābeak example illustrates this point. It is clearly a humanistic view of nature and its value, not a result of the robust research that will be required to prevent species extinction.

We stress the urgent need for funded research to address the deficiency in data of so many species; the species 'prescription'. The strategy should recognise and tap into our university resource by funding targeted post graduate work that fill the gaps so that species requirements for their survival are known.

**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 4:53 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Name:** [REDACTED]  
**Organisation:** [REDACTED]  
**Email:** [REDACTED]

q1: No. The Vision is hard to find and is a collection of rather random statements about goals, background, methods and relationships. It is far too long and in no way motivational. It is far too long and in no way motivational.

q2: The vision needs to draw on the current first sentence of "safeguarding vulnerable threatened species", to explain the intended outcomes of the goals in an inspiring way. How does the Threatened Species Strategy (TSS) contribute to NZ's overall biodiversity goals? How will the chosen Top 10 actions help to ensure the protection of the chosen 150 species?

q3: On the whole this is OK. There is not enough consideration of the effects of climate change e.g. changes (increases) in temperature regimes and storm patterns. These are likely to adversely affect and probably change downwards the threat status of a number of species including iconic spp, especially restricted distribution and naturally rare spp. Marine spp (see below) and microbes/soil biota are conspicuous absences – the large number of spp certainly including TS should at least be mentioned even if we are not able to adequately summarise our knowledge of these spp.

q4: Probably a reasonable range of tools are identified. I think the first tool of recovery planning needs more emphasis. Planning of species recovery action is the first and most important step in the strategy and must include planning of species work in the appropriate context of habitat/places planning and protection (see Q 15).

It is interesting to note that the NPS for Indigenous Biodiversity receives one mention in the last paragraph of this whole section. I believe this is appropriate given that this NPS has been "on the books" for almost 20 years, was a key goal in the 2000 NZ Biodiversity Strategy, and has essentially gone nowhere despite many assurances of progress. However elsewhere in the TSS there are a number of references to the NPS and an unduly high emphasis is placed on it. I do not have high expectations of the NPS, especially in regard to TS recovery.

q5: As above, planning of species work in the appropriate context of habitat/places planning and protection needs more attention. DOC has or has had a number of important programmes for integrated places/species management planning and the current version of them have a critical place in the TSS.

q6: 6. Will the proposed goals help us achieve the vision and assess our progress?

Only in part. Goals 1 and 2 are OK in intent, but goal 1 is too vague. "Manage x species" is not a goal – what are the outcomes desired for these species? There was a useful discussion at the consultation meeting I attended about aiming for TS to reach a "persistence zone" – this could be useful goal if the persistence zone concept could somehow be translated into a measurable goal. The statement about a 40% increase on current levels of TS management is useful background but contributes nothing towards the goal itself and should not be part of the goal statement.

Goal 2 is good. A clearly-stated, ambitious but attainable target that clearly contributes towards the overall vision. Goals 3 and 4 are also supported as concepts but are hopelessly vague as goals. How much integration, how much research, what is intended to be achieved?

For goal 3, a quantified target for joint decision-making about TS plans would be one logical goal. It also seems to me as a Pakeha that to incorporate Te Ao Māori into TS management would require some degree of sustainable cultural harvest to be possible. A goal of having at least one iconic TS to be able to sustain a specified level of cultural harvest could therefore be an option (which is also comparable to the goal of having at least mammalian predator exterminated).

Goal 4 is a bit more specific and I support the intention of emphasis on data deficient species. Surely some specific targets about how much reduction in the number of DD species by 2025 should be possible. I'd also like to see more

emphasis on reducing the gaps in our knowledge in particular environments, especially marine habitats, as well as specified research on inter-species interactions and species-environment interactions.

q7: A goal dealing with species/places integration (see q 15) would be appropriate.

q8: On the whole these are good. In particular, the first two themes on uniting on landscape scale, and managing ecosystems at scale are good and go some way to recognising my concerns about species in their landscape/habitat/place context (see q15), but this is far too late in the strategy to introduce these ideas. These two themes make it clear that we cannot manage TS without managing landscapes (seascapes), habitats and places – some of the programmes and actions implied in these statements need to be translated into the goals. I think this will require some work on a species/places matrix which I understand is an important component of some of DOC's current management approach. Management on this places/species matrix also requires attention to other threats to TS than pests and weeds, e.g. natural disturbance, climate change impacts, overuse from recreation or infrastructure, habitat loss. These must all be at least acknowledged in the TSS.

q9: #5. As above, I am sceptical about the ability of a NPS for indigenous biodiversity to make a critical difference for TS. If there is good reason for it to be a Top 10 Action, there must be a specific target for achievement, well before 2025. It has been "in development" for nearly 20 years now, surely it won't be much use if it is still "in development" in 2025?

Support new marine protection legislation to achieve species protection goals through a range of MPAs. Not all marine TS management is likely to need Marine Reserves, a much wider range is needed.

#7. This is important. It is the only Top 10 action that mentions areas.

#8. There seems to be a mismatch between the goal of 500 spp for protection, and the action of 500 data deficient spp for further work. Surely the same 500 species would not be on both lists? On the other hand, 1000 spp for protection or research would seem over-ambitious. This action needs clarification.

General: Even for a high-level strategy, the number of goals (4) and actions (10) is insufficient to explain to DOC, government departments or all other stakeholders what is intended to happen under the TSS. It is not at clear to me how the goals of the TSS will help guide decisions by "councils community groups, philanthropists, NGOs" and other stakeholders (p3), let alone conservation Treaty partners. For example, the targets for choice of TS for protection and data deficient research would need to be in some way regionalised to make them locally meaningful. Presumably there is some more detailed planning lying behind this TSS, or least be scheduled. This planning should at least be referenced in some way in the final TSS.

q10: A programme that provides much more specific information on TS that are likely to be most adversely affected by climate change, and suggest spp recovery work that addresses those threats, seems to me to be a high priority.

q11: aboutright

q11comments: Seems about right in total, subject to clarification between spp for protection and spp for research (comment on q9, #8)

q12: I agree with the separation into 50 "notable"/"iconic" spp and 100 managed "other" TS. It is quite reasonable to have this separation into subjectively chosen "notable" spp and other more objectively chosen spp.

q13: Don't wish to comment in detail but the list seems notably deficient in marine species. This is totally implausible for an area 15 times greater than NZ's land area. If there is so little information on marine species that all the "likely to be threatened" marine species are data deficient, then marine spp must be the overwhelming priorities for the data deficient research programme.

q14: nly in part. I agree with having a TSS but this draft appears to have been very hurriedly developed and misses the opportunity for a visionary and rationale basis for progress. I hope that the revision will be able to make some significant improvements.

As a note, I found the layout of this draft document confusing and very difficult to work with, even given its quite short length. The order of contents seemed illogical to me. The Strategy also needs to have a comprehensive Table of Contents that provides more information than a series of slogans, e.g. including the vision.

q15: A) My background: I am an independent environmental consultant and part-time lecturer in environmental studies at Victoria University of Wellington (including biodiversity conservation). I have significant experience in biodiversity policy development including several years working for DOC on the 1999 draft NZ Biodiversity Strategy and consultation, and the General Policy for Conservation legislation project. I attended the 19 July briefing/consultation for Wellington conservation stakeholders (Leonard Cockayne Centre) and found this very helpful as an introduction to making a submission.

B) Context for the TSS: Embodied throughout NZ's approach to nature conservation is the principle that species and places/habitats/land/seascapes must be managed together. All species require ecosystems and habitats to live in; therefore species (including threatened species) cannot be managed independently of those ecosystems and

habitats. The authors of the draft strategy do appear to understand this principle from various statements buried within the draft, but this understanding is not at all clear from the way the strategy is laid out and expressed. The “places” context for TS management needs to be much better laid out, earlier in the draft, and drawn on in all sections. The places component, or the integrated management of places and species, probably deserves a specific goal or at least incorporation within the TSS goals. Protecting or managing anaging places and land/seascapes also is an insurance policy that helps protect and manage the data deficient TS that live in those places.

This context will also require a more logical policy setting for the TSS, and the Predator-Free NZ 2050 Strategy. The PF2050 Strategy is a vital part of the TSS, and may well be the most important springboard for progress, but in terms of policy development, it is not the starting point and/or centrepiece of the TSS, which it appears to be in this draft. Rather the starting point of the TSS should be the NZ Biodiversity Strategy and Action Plan, mentioned just once on p14. This strategy lays out the correct context for threatened species work of which this TSS is an important component. In turn, the PF2050 programme is an important component of the TSS, but not the starting point, as in fact implied on p3 (“needs to be part of a broader suite of actions”). Seeing the relationship as summarised above should help to organise this broader suite of actions.

C) Whose Strategy is this? The cover suggests that this is New Zealand’s Strategy for Threatened Species. I believe this is the appropriate “ownership” of the TSS. But within the draft text, the TSS is variously described as the Government’s Strategy and DOC’s Strategy. It can’t be all of these. The “all part of the solution” section, the strategic partnership theme and many other references and Spotlight boxes make it clear that many players other than DOC or government departments need to be involved, but this needs to be consistently expressed throughout the TSS. Even the obvious need for a whole-of-government approach is not adequately recognised.

# New Zealand's Threatened Species Strategy: submissions for consultation

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## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
(if on behalf of an organisation)

Email:

Signature:  
(we accept a typed signature if  
no electronic signature)

On behalf of the New Zealand Herpetological Society (NZHS)

## Submission:

### You can answer all or some of the questions.

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

The NZHS supports the vision proposed by the Threatened Species Strategy as it will benefit endemic herpetofauna.

2: Are there additional aspects that you think should be included in the vision?

While we support the current proposed vision, we believe there are significant predators which are not acknowledged in the predator-free goal, specifically mice, weasels, ferrets, hedgehogs and cats. These species are responsible for significant losses of biodiversity values and their management and eradication from areas of biodiversity significance should be included in the predator free vision. Cats, in particular, cause significant declines of endemic fauna in both rural and urban areas, and supporting the implementation of greater controls on urban cat ownership (microchipping, registration, curfews and de-sexing) should be an issue at the forefront of the predator-free vision.

Introduced herbivores (lagomorphs, pigs, chamois, thar and deer) are highlighted as a pest of concern but are not included in the Threatened Species Strategy vision. Given the significant ecological changes caused by introduced herbivores, support should be given to eradication and control programmes in areas of high biodiversity value within the threatened species strategy vision.

The NZHS also supports stronger control and management of the introduced Rainbow skink, *Iampropholis delicata*, a threat to endemic skink species. This species outcompetes native reptiles in other areas of its spread, and its eradication should also be included in the Threatened Species Strategy vision to support endemic herpetofauna conservation.

3: Do you agree with the characterisation of the value and current state of our native species?

We agree that the value of herpetofauna is highlighted and correct. However, no sources are supplied regarding the characterisation of the current threat state of endemic reptiles. Both the 2015 threat ranking document (117 species) and the 2012 threat ranking document (110 species) for reptiles listed more species than what is quoted in the Threatened Species Strategy document (Figure on page 19). It is unclear how only 106 reptile species were included and not the full range of species currently identified.



While only a handful of endemic reptile species are specifically classified under the “Data deficient” threat ranking, 42.7% of New Zealand reptiles have a “Data Poor” classifier in addition to their threat ranking in the most recent threat classification for this group<sup>1</sup>. This data poor classifier is not acknowledged anywhere in the Threatened Species Strategy document and should be an important consideration in assessing the value of further species management and research rather than using threat rankings alone, as management and conservation of a species is difficult when it is poorly known.

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

We support the tools identified within the document. However, we believe changes could be made to the use of some tools identified:

- **Species Prioritisation**  
We believe prioritisation of species recovery at a limited number of “high-value native ecosystem’ sites will disadvantage herpetofauna conservation due to the following issues:
  - Prioritising sites of high species occurrence may not target sites and populations most in need of conservation action.
  - Limiting the recovery to a few targeted high-value sites could significantly impact on the genetic diversity of a species, ultimately limiting recovery and creating barriers to further evolutionary change and species diversification. Species should be managed to fully preserve representative genetic diversity across their entire range of distribution.
  - Our poor understanding of current reptile taxonomic relationships means that not conserving species across their full range could result in the loss of currently undescribed species.
  - New species are still being discovered (such as the Awakopaka skink), and their conservation relies on broad, multi-site management rather than conservation at a few targeted sites.
- **Captive Management**

The NZHS supports the initiation of new captive management programmes for New Zealand herpetofauna that have clear conservation benefits and goals.

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<sup>1</sup> Hitchmough, R.A. et al., 2016. *Conservation status of New Zealand reptiles, 2015*. New Zealand Threat Classification Series 17, p.14. Available at: <http://www.doc.govt.nz/Documents/science-and-technical/nztcs2entire.pdf>.

Captive management of threatened reptile fauna has been successfully carried out by NZHS members previously, with knowledge, facilities and time devoted to threatened species recovery. The NZHS supports the establishment of new breed for release programs between NZHS members and the department to support endemic herpetofauna.

5: Are there other tools we could use to help us achieve the vision?

Further research into identifying effective predator management techniques to support threatened reptile species recovery should be encouraged to achieve the proposed vision. Additionally, further research into new methods of broad-scale species control, such as gene-drive, should also be initiated to achieve the proposed vision.

6: Will the proposed goals help us achieve the vision and assess our progress?

The proposed species management goals provide a clear point of achievement to assess progress. However, species research support should not be limited to those herpetofauna species under the data deficient threat ranking given the high number of species listed to have the “data poor” classifier. Encouraging research into “data poor” species is necessary to enable their effective conservation and management, irrespective of their current threat ranking. Research into additional species conservation, eradication and management techniques should be supported.

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

See above for additional goals and changes to those proposed.

8: Have we identified the right strategic themes?

The NZHS supports the strategic themes identified.

9: Do you agree with our top 10 actions?

We agree with the top 10 actions but support changes to the following:

- Goal 1. Predator free goals should include all introduced mammalian predators which significantly impact on endemic herpetofauna (cats, weasels, mice and ferrets) as well as introduced herbivores which dramatically change ecosystems (lagomorphs, deer, chamois pigs, etc.) and those introduced species directly displacing endemic lizards (rainbow skink).

- Goal 8. Data deficient species do not accurately capture data poor herpetofauna species in need of immediate conservation actions, and a broader research focus into all data poor species is required.

10: Are there any other actions that should be included, and any actions that should be removed?

- See above for changes/additions

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right • Too few

**Comments:**

12: Have we identified the right priority species?

Reptile fauna are underrepresented within the priority species list, despite the entire group's endemism and high number of significantly threatened species. This is likely to be reflective of the low number of reptile species under management in 2016, and highlights this flaw in the process of priority species selection.

13: Do you think other species should be prioritised ahead of the ones listed? And why?

All those threatened herpetofauna species facing an immediate risk of extinction due to a limited distribution, such as the Te Kakahu skink, should be prioritised over more widespread species (such as the Duvaucel's gecko).

A reassessment of priority species selection which incorporates the large number of herpetofauna which are data poor is required to effectively prioritise conservation efforts within this group. Including all herpetofauna species in the selection process, not just those currently managed, is essential to avoid species extinctions.

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

The proposed vision, themes, goals and actions are positive steps towards producing an effective framework for conserving threatened species. However, see above comments on the vision, focus themes, goals and actions for additional changes or actions necessary to ensure highly threatened herpetofauna species are safeguarded against extinction.

15: Do you have any further comments regarding the draft Strategy that is not covered above?

A clear understanding of how the removal of some predator species may impact on others which are not controlled is required to ensure mesopredator release is avoided. The control of rats, but not mice, has previously been shown to greatly increase mouse populations and predatory behaviours. As mice are a predator of endemic herpetofauna, the NZHS supports careful consideration of the issue of mesopredator release when undertaking any control which could cause unintentional increases in mouse populations, or prey-switch by non-target predator species (weasels, cats, etc.).

# New Zealand's Threatened Species Strategy: submissions for consultation

#160

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### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
*(if on behalf of an organisation)*

Email:

Signature:   
*(we accept a typed signature if  
no electronic signature)*



**Submission:**

You can answer all or some of the questions.

**1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

*No – This vision lacks ambition when it comes to protecting our threatened and at risk native species.*

*To achieve this, the Strategy's vision needs to be much more ambitious than just aiming to safeguard 20% of our threatened species by 2030.*

**2. Are there additional aspects that you think should be included in the vision?**

Yes

- *the need to halt the loss of habitats that support threatened species*
- *Increased emphasis on improving our knowledge of the threats to, and conservation status of, species.*
- *Actions for threatened marine species.*

**3. Do you agree with the characterisation of the value and current state of our native species?**

*Yes I Agree with the value of our biodiversity.*

**4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

*The Strategy places too much emphasis on the need to prioritise the work between threatened species. This emphasis appears to be driven by the lack of resources, rather than conservation need. All threatened and conservation dependent species need to be managed for protection and there needs to be flexibility to be able to work on species that may not have been prioritised, but where an opportunity or a necessity arises.*

*Captive management should only ever be a last resort tool, as the priority for threatened species must be conservation in their natural habitats*

**5. Are there other tools we could use to help us achieve the vision?**

*The best possible tool is to ensure that the Department of Conservation is adequately funded to undertake all the steps necessary to restore all species at risk of extinction and to prevent others from becoming threatened.*

**6. Will the proposed goals help us achieve the vision and assess our progress?**

*No, the proposed goals need to be considerably more ambitious.*

*There are no goals to achieve enhancing all of our threatened and at risk species, or increasing knowledge about the many data deficient species so that no species are data deficient.*

**7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

Yes,

- *Manage all threatened species requiring conservation intervention for protection so that no species should become more threatened*
- *All threatened and conservation dependent species should be actively managed for recovery by 2030.*

**8. Have we identified the right strategic themes?**

*The following additional theme should be included:*

- *Uniting all Government Agencies in an “all of government” response to threatened and at risk species to ensure all native species thrive.*

**9. Do you agree with our top 10 actions? -**

*Yes with additions as detailed below.*

**10 Are there any other actions that should be included, and any actions that should be removed?**

*In addition to achieving the Predator Free 2025 goals and the Battle for our Birds, increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control.*

*Introduce regulations to achieve zero bycatch of threatened species in fisheries.*

*Expand the War on Weeds to include lupins, broom and willow on river beds and their margins*

**11. Have we identified the right number of priority species?**

(Circle or highlight one) • Too many • About right • **Too few**

**Comments:**

*The priority list of threatened species must be based on the conservation needs of all species rather than fitting the prioritisation to the current lack of resources.*

**12. Have we identified the right priority species?**

**No**

*All the threatened species and those that are at risk must be prioritised.*

**13. Do you think other species should be prioritised ahead of the ones listed? And why?**

*Prioritisation should be dependent upon threat status, with account taken of the imminence of threats and be less influenced by the cost of managing them.*

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

*The vision lacks ambition to conserve NZ's threatened species. It only proposes to increase the populations of 150 out of 800 threatened species at risk of extinction, and manage 600 out of a further 2,200 species at risk of decline. The vast majority of threatened and at risk populations which need help now are not covered by the Strategy's proposals for action.*

*Additionally the Strategy fails to commit all government agencies to commit to achieve the strategy's goals.*





Norm Kelly  
Project Manager – Threatened Species Strategy  
Department of Conservation  
PO Box 10420  
Wellington 6143

31 July 2017

Dear Norm

### **RE Submission on the draft Threatened Species Strategy**

Recently, the Parliamentary Commissioner for the Environment (the Commissioner) produced a report that highlighted the perilous state of many of New Zealand's native birds. She recommended a number of actions aimed at restoring abundant and diverse populations of birds on mainland New Zealand.<sup>1</sup>

This submission on the Department of Conservation's draft Threatened Species Strategy (see attached Appendix) draws upon the conclusions and recommendations of the Commissioner's report, and is made in the context of supporting this important initiative.

Time commitments preclude the Commissioner from submitting on the draft strategy herself. Instead, this submission is made in my name, as the Commissioner's Principal Science Adviser.

My professional expertise is in population and community ecology, with a particular focus on mammalian predator-prey interactions and the consequences of these interactions for threatened native species. Among other projects, I led the Parliamentary Commissioner's investigation into the use of sodium fluoroacetate, and was closely involved with the Commissioner's recent report on saving New Zealand's birds.

Yours sincerely

Dr Grant Blackwell

Principal Adviser – Science  
Office of the Parliamentary Commissioner for the Environment

## **Appendix**

### **Submission on the draft Threatened Species Strategy**

Dr Grant Blackwell  
Principal Adviser – Science  
Office of the Parliamentary Commissioner for the Environment

In this submission, I set out a number of key features that are essential to the success of a Threatened Species Strategy for New Zealand. The submission contains the following four sections:

- Protecting threatened species across all land tenures
- An action plan for the threatened species strategy
- Developing supporting information and tools
- Investing in our natural heritage.

### **Protecting threatened species across all land tenures**

The Department has a key role in protecting biodiversity, but it does not have the legislative powers or resources to protect all native species and ecosystems across all land tenures. It is a task that should not, and cannot, fall solely on the Department of Conservation.

Regional councils are the primary agents for land management and biodiversity protection across the majority of New Zealand, whilst the Ministry for Primary Industries has the key role in managing biosecurity risks. Iwi, farmers, individuals and community groups directly manage and protect biodiversity on private land.

For a threatened species strategy to be successful, a wide range of agencies, organisations and individuals beyond the Department of Conservation need to play a vital role.

Regional councils have recently evaluated their role in the management of biodiversity, and have drawn up a series of objectives and actions to enhance their contribution and effectiveness.<sup>2</sup> This work needs to feed into the development of any threatened species strategy.

A threatened species strategy must also fit with other goals and obligations for the management of habitat and biodiversity – both within the Department of Conservation and other agencies, and as part of our international obligations.<sup>3</sup> It must, for example, align with strategies developed for Predator Free 2050.

## **An action plan for the threatened species strategy**

A strategy will only be successful if it leads to better action on the ground. A strategy needs to be accompanied by an action plan that outlines what the priority actions are, what needs to be done and by when, and who is responsible for getting things done.

### ***What actions are needed?***

On conservation land the Department of Conservation is clearly the lead agency, and habitat is relatively intact. Therefore, the most pressing issue in most situations will be controlling invasive species. However, many threatened species live outside the public conservation estate.<sup>4</sup>

A focus on large landscapes is essential to successful species conservation. Large areas are likely to support many species that are not yet threatened, and draw in the many individuals and agencies that have a role to play. But it is important to choose which landscapes and ecosystems to focus on, and what is required to protect threatened species in each one.<sup>5</sup>

The action plan needs to clearly set out what tangible steps will be taken, and in what order, to restore and protect threatened species.

The action plan should be a living document that is reviewed and updated regularly.<sup>6</sup>

A key part of the action plan should also involve regular reporting on progress. For example, the Australian Threatened Species Strategy reports every year on progress towards the strategy's targets and actions.<sup>7</sup>

### ***Roles and responsibilities***

An action plan should make it clear who is responsible for what. The Department of Conservation should take the lead across government agencies, and play an important role in management actions on public conservation land. However the department is not the decision-maker responsible for the management and protection of all biodiversity. For example, DOC only has the power to advocate for biodiversity on private land, and does not have the ability to set rules around land use and habitat clearance.

For many threatened species and broader biodiversity, other agencies and actors are the decision maker – particularly regional councils and unitary authorities. And often, actions to protect threatened species will be at the local and regional scale.

A threatened species strategy should provide a framework that clarifies what actions councils and others need to take in which places to better manage biodiversity.

For example, braided river beds and their adjoining dryland ecosystems are under serious pressure on many fronts. Land owners, LINZ, DOC, and councils will need to have a coordinated plan to manage these systems effectively and ensure the survival of the threatened species that live there.

Dr Grant Blackwell – Submission on the draft Threatened Species Strategy

Public involvement will be vital for ownership and uptake of the strategy. Partnerships with the wider community will be more effective if they can be aligned with a strategy that outlines the most important areas to focus on, and the most urgent actions that need to happen in those places.

## Developing supporting information and tools

### *Building our science and knowledge base*

For a strategy to succeed, basic information gaps about many of our native species – what state they are in, what they need to thrive, and what threats they face – will need to be filled. This information is clearly vital in identifying the species that need help and what needs to be done to protect them.

Effective long-term control of predators will likely depend on the development of break-through science solutions. There is value in this approach, but there are no guarantees such a ‘silver bullet’ will be found. As the Parliamentary Commissioner for the Environment points out in her report on saving New Zealand’s birds – *“It is important that all options be kept open, and that research money is not prematurely funnelled into one area.”*<sup>8</sup>

There is also a clear need to step up the predator control being carried out now. This includes urgent research on how to better use the tools we already have.

The Commissioner’s report identified three key areas of research that need high priority support right now: slowing the return of predators after control operations; identifying threshold levels of predators that keep different species safe; and developing new tools and methods to control mice and cats.<sup>9</sup> The value of this research is not limited to bird species, but broadly applies to many biodiversity efforts.

### *Clearer guidance*

To be successful, the threatened species strategy will require a co-ordinated approach. It is essential therefore, that conservation efforts are based on sound, principled guidance. There are some areas where multiple approaches to the same problem are leading to uncoordinated action. There are other areas where guidance is entirely lacking, leaving a vacuum.

For example, there are a number of programmes underway for identifying priority areas for management – all using different processes. These include the Department of Conservation’s species and ecosystem prioritisation systems, work under Battle for Our Birds and the War on Weeds, and a set of sites for projects with the NEXT Foundation. There are also landscape scale projects across private land, such as Cape to City and Reconnecting Northland.

The action plan should outline how these programmes will be coordinated in order to make more efficient use of conservation resources.

For some programmes no overarching principles or guidance exists. In her report on saving New Zealand’s birds, the Commissioner noted that the Department of Conservation has no policy to guide the translocation of birds and other species into new areas, or indeed the wider management of the genetic diversity of species.

The action plan should clearly identify when and how these and other policy gaps will be filled.

*Mobilising and supporting communities*

Across the country, hundreds of groups and thousands of individuals are hard at work at conservation – controlling predators, and protecting and restoring habitats.

In her recent report, the Commissioner identified a number of challenges that community groups face, including accessing and securing funding, attracting skilled volunteers, and fulfilling reporting requirements.

To support these dedicated groups, the Commissioner recommended the establishment of regional biodiversity hubs to “*coordinate and support community conservation groups.*”<sup>10</sup>

These hubs would be supported by, and draw on the expertise of, regional councils and could help support and coordinate the actions of community groups across the country. Hubs would be focused at the local scale, but guided by the shared vision of the strategy.

Regional hubs could provide services such as:

- administrative and accounting expertise;
- assistance with funding applications and reporting;
- training and certification in trapping and laying poison, health and safety;
- advice on plant choices and habitat restoration; and
- sharing of information among groups.

## Investing in our natural heritage

It is clear that stepping up the protection of threatened species will be an enormous task and will require substantial investment across the country.

In her recent report on native birds, the Commissioner noted:

*“In 2014, the Battle for Our Birds cost about \$20 million. That battle was fought using cost-effective 1080, but it was only fought over 16% of the area of forest that was masting and causing rodent and stoat populations to soar. To control predators in all masting forest in 2014 would have cost about six times as much.”<sup>11</sup>*

That is to say, controlling predators across the entire masting forest in 2014 could have cost \$120 million – approximately three quarters of DOC’s annual biodiversity budget.<sup>12</sup> And this does not include predator control in warmer forests where rodent numbers are high most of the time, or the many other pressures on threatened species.

The Commissioner has called for the Minister of Conservation to explore new revenue streams to fund biodiversity conservation in New Zealand.

Building collaborations between central and local government, iwi, private business, philanthropists, and science will no doubt bring more resources to conservation. However, for a threatened species strategy to be successful, it will require an analysis of the level of investment required to achieve it.

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<sup>1</sup> Parliamentary Commissioner for the Environment, 2017. *Taonga of an island nation: Saving New Zealand’s birds*.

<sup>2</sup> Enfocus (In Press), Biodiversity and the role of Regional Councils: Stage 2 of a thinkpiece on the future of biodiversity management in New Zealand.

<sup>3</sup> For example, New Zealand has made commitments to manage biodiversity under the New Zealand Biodiversity Strategy, and under international commitments such as the Convention on Biological Diversity and the Ramsar Convention.

<sup>4</sup> In her report on saving New Zealand’s birds, the Commissioner recommended a range of actions to protect the habitats of threatened species. In particular, these included developing policies and initiatives to increase the control of predators in covenanted areas and riparian habitats, and reducing the pressure on braided rivers and dryland margins (pg 105).

<sup>5</sup> In her birds report, the Commissioner suggested that the first step in developing a plan should be geographic – to identify the areas where efforts should take place. Some of the criteria suggested by the Commissioner for choosing these areas are more relevant to birds than other species, and to predator control than other pressures, but nonetheless are useful to consider:

- species rich areas – places where many species can benefit from management in one place;
- places where especially precious species live, such as deep endemics;
- a range of ecosystems and regions should be represented;
- these places should not be confined to the conservation estate – many rare species and ecosystems exist on private land, Māori owned land, and council and LINZ administered land;
- areas should be large because pests take longer to reinvade, and because larger populations can be supported, thus maintaining better genetic diversity;
- areas with natural barriers to reinvasion should be considered wherever possible;
- potential wildlife corridors should be considered;

- areas with strong community support should be considered.

<sup>6</sup> The Commissioner made this same point in relation to the Predator Free 2050 programme in her recent report on saving New Zealand's birds "*Trying to prepare a detailed plan stretching out to 2050 would be unwise. Rather, the plan should be a living document that can be frequently edited and updated*" (pg. 99).

<sup>7</sup> For example, see Commonwealth of Australia, 2016 *Threatened Species Strategy – Year One Report*.

<sup>8</sup> PCE, 2017. *Taonga of an island nation: Saving New Zealand's native birds*, pg.103.

<sup>9</sup> Chapter 5 of the Commissioner's report *Taonga of an island nation: Saving New Zealand's birds* outlines these research areas in more detail. The Commissioner also recommended that high priority be given to the following areas of research (pg 102):

- a) Slowing the return of predators after a control operation;
- b) Optimising the use of 1080 in different forest systems;
- c) Improving the effectiveness of 1080 for controlling mice;
- d) Understanding the predator levels that are safe for different bird species, and developing techniques for measuring predators at low densities; and
- e) Developing new baits and lures for the control of feral cats.

<sup>10</sup> PCE, 2017. *Taonga of an island nation: Saving New Zealand's native birds*, pg.110.

<sup>11</sup> PCE, 2017. *Taonga of an island nation: Saving New Zealand's native birds*, pg.107.

<sup>12</sup> The Department of Conservation's expenditure on management of natural heritage in 2014 was \$163 million (DOC Annual Report 2015, pg. 92).



# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter or contact person:	[REDACTED]
Organisation name: <i>(if on behalf of an organisation)</i>	Coromandel Watchdog of Hauraki Incorporated
Email:	[REDACTED]
Signature: <i>(we accept a typed signature if no electronic signature)</i>	[REDACTED]

Coromandel Watchdog Of Hauraki Incorporated is a not for profit community organisation that was established 35 years ago to protect the Coromandel Peninsula from industrial gold mining. One of the reasons why the community of the Peninsula did not, and still does not, want mining on our lands or in our waters is due to the high ecological values we see in our area. This includes a number of threatened species, such as the Archey's Frog, kiwi, Coromandel striped geko, king ferns, various orchids and others.

We applaud the initiative to formulate a Threatened Species Strategy. This has become a matter of real concern to us as a mining company is currently actively drilling on Conservation land that is habitat to one of our most threatened and unique frogs, the Archey's Frog. This is occurring at Parakiwai/Wharekirauponga, and we have serious doubts around the safety and integrity of their habitat while such activity is being allowed.

Finally, we appreciate the opportunity to make this submission, and look forward to seeing the final Strategy, implementation and the benefits to our Aotearoa New Zealand flora and fauna that must surely come of it.

*Toitū te marae a  
Tāne-Mahuta, Toitū  
te marae a Tangaroa,  
Toitū te tangata.  
If the land is well  
and the sea is well,  
the people will thrive.*

**Submission:**

**1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

No. Out of some 3000 threatened and at risk species, to aim to manage only 500 within the next 8 years, and only a further 100 over the next 5 after that is a very low number to aspire to. The terminology used – threatened, at risk, vulnerable seems to be interchangeable and have little meaning – or relationship with the threat classification system. It is also our opinion that the final sentence is, at best, condescending and should be removed.

We believe that the proposed vision should be brief, clear and aspirational.

**2: Are there additional aspects that you think should be included in the vision?**

A clearer more succinct vision would be more suitable, and should and could reflect the Biodiversity Strategy; "The full range of New Zealand's indigenous ecosystems and species thrive from the mountains to the ocean depths;" or from the action plan: "By 2025, the extinction of known threatened species has been prevented, and the conservation status, particularly of those most in decline, has been sustained or improved."

### **3: Do you agree with the characterisation of the value and current state of our native species?**

We believe that all of our native species are of significant importance, and that halting their decline, and subsequently increasing their numbers until there are resilient and successful populations of all is a vital task, and one which should be core business for the Department. We agree that prioritising species insofar as targeting those that are at most serious risk first is logical, but we are of the mind that Aotearoa New Zealand's nature is at a crisis, and that work to halt extinction, to improve populations, availability of habitat and resilience of species is urgent, and must occur for all of our ecosystems urgently.

### **4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

Some.

Recovery planning should and could be informed by consultation with on the ground organisations that are working in areas or with species that are threatened or at risk, and that consultation with such groups should also be a tool that is identified as important.

Captive management has limited value, in that it contributes little to the natural ecosystem. We are concerned that this tool not be relied on in any situation other than where the numbers of species is so low that there are no other options; we also believe that instances where this is used for fauna must ensure that natural behaviours are encouraged, and that human handling is minimised.

Regulation should also refer to monitoring and compliance, there are currently areas that are protected, but that protection is able to be removed to make way for economic activities such as mining. Any regulatory protections must be strengthened and any erosion of them should be closely monitored and cumulative effects considered.

### **5: Are there other tools we could use to help us achieve the vision?**

Collection of genetic data could also be included as a valuable method.

### **6: Will the proposed goals help us achieve the vision and assess our progress?**

Yes, but possibly not enough.

We would suggest that Goal 1 be a far bigger goal – i.e. include many more of our 3000 threatened/at risk species; the goal being so small to start seems to imply a lack of enthusiasm or will.

Goal 2 should also refer to habitat protection and conservation; species need more than just having their number increased i.e. via captive management.

Goal 3 is a little generic, but the intent is admirable.

We believe that linking goal 4 to the National Science Challenge is not ideal,; these challenges have a stated mission of enhancing New Zealand's economic growth. Biodiversity has an intrinsic value that goes beyond its ability to enhance economic growth.

**7: Are there alternative goals that you think will better achieve the vision and assess our progress?**

Comprehensive baseline data of any species for which that isn't currently available within the first 5 years.

**8: Have we identified the right strategic themes?**

Theme 1, uniting. Reference should be made here to grass roots projects and ensuring that these get greater support and resourcing. Many of our most successful predator programs operate at this level, and also promote a sense of ownership within their communities.

Theme 2 should also reference finding better ways of eradicating with pests and pathogens. Education is missing from the themes – and indeed from much of the strategy.

**9: Do you agree with our top 10 actions?**

Again, education is a missing element as is climate change; appropriate legislation for dealing with the effects of climate change, and assessments of the impacts of climate change on threatened species should be included.

Strengthening other legislation to provide better protections should also be a priority, such as entrenching base protection for any area with known threatened species presence, and halting any and all activities, such as mining, from occurring on the conservation estate – particularly where there are known and documented threatened/endangered species.

**10: Are there any other actions that should be included, and any actions that should be removed?**

The plan seems to rely fairly heavily on existing projects to manage some areas, like Predator Free 2050. While these projects are good, there is a need for many more methods to achieve what should be the overarching vision of this Strategy, to prevent extinction, halt decline and increase populations of threatened species. Other actions that could be included include the introduction of new protective instruments that would afford far greater protection for environments that are known to be habitat to threatened species, particularly where there is an economic argument for compromising those environments.

**11: Have we identified the right number of priority species?**

- Too many
- About right
- Too few

**Comments:**

**12: Have we identified the right priority species?**

There should be more. As mentioned, targeting species that are the most in decline is logical, but it must be done with other species and risks in mind. It would not be

logical to lose the other threatened species to extinction while trying to ‘manage’ the ‘top 500’.

**13: Do you think other species should be prioritised ahead of the ones listed? And why?**

No answer. However, we note that the population of Archey’s Frog in the Parakiwai Wharekairauponga area is in real danger of being significantly harmed, simply to allow a mining company to drill exploratory holes for gold; we believe that this sort of activity – destructive commercial activity – should not be permitted on conservation land, particularly where there are well known and documented threatened species.

**14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

We think it is very positive that the Department are formulating such a Strategy, but we think that it should be clearer, more concise and more aspirational.

**15: Do you have any further comments regarding the draft Strategy that is not covered above?**

Much of the discussion around enhancement of these species does not make any reference to their natural ecosystem or habitat. We believe that it is imperative that the strategy is clear that it has an overarching aim to reduce the number of species we have currently got recorded as threatened or at risk, primarily by ensuring that numbers of these species increase in their natural environment. Using instruments such as pest and predator control, fencing, genetic recording, translocations, area closures etc.

## Submission on New Zealand's Threatened Species Strategy

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### Submitter details:

Name of submitter  
or contact person:

[REDACTED]

Organisation name:  
(if on behalf of an organisation)

Royal Forest and Bird Protection Society

Email:

[REDACTED]

Signature:

[REDACTED]

Forest & Bird appreciates the opportunity to comment on the Draft Threatened Species Strategy. Forest & Bird is New Zealand's largest independent conservation organization, with many members and supporters and over 50 volunteer branches throughout NZ.

Forest and Bird members work to preserve our natural heritage and native species. Our members, branches and staff are directly involved in the on the ground protection and enhancement of indigenous threatened species. Our stated mission is to "Give Nature a Voice".

Forest and Bird is the New Zealand partner of the global BirdLife International network of NGOs with partners in 120 countries. Through these and other international connections Forest & Bird is working to protect threatened species that are at risk beyond New Zealand's jurisdiction.

### Overarching Recommendations

Many detailed recommendations are included in the full submission below.

1. It would be useful to provide an indication of the likely costs for the implementation of the proposed strategy.
2. The proposed Strategy needs to be reviewed and amended to produce a credible, scientifically robust 'All-of-Government' Strategy that sets out a plan to protect all threatened and at risk species. Setting those species in serious trouble on a path for recovery by 2030, and vastly improving our knowledge about all the species we don't know enough about.
3. The Strategy should set out the methodology for monitoring and reporting on its implementation.
4. The Strategy should include actions to:
  - ❖ Bring all of the public conservation land needing predator control under regular sustained predator control.
  - ❖ Develop scenarios and plans for threatened species protection under different climate change eventualities, eg around 2 degrees of warming if the Paris Agreement target is met, and up to 4 degrees of warming if warming continues on its current trajectory.

- ❖ Implement national recovery planning for all threatened species and recovery plans for threatened species requiring specific management to restore their populations.
- ❖ Halt the destruction of habitats of threatened species.

5. All government agencies should have a responsibility under the Strategy to ensure that their policies and actions support the protection and restoration of threatened and at risk species.

### **General Comments**

Forest and Bird welcomes the development of a Strategy for threatened species, however the proposed strategy does not go far enough. It needs to be more ambitious, should plan for the impacts of climate change and have the goals or actions needed to meet our international commitments to maintain and restore viable populations of all indigenous species and subspecies across their natural range and maintain their genetic diversity. The Strategy needs to set out a clear plan of action to achieve this within specified time frames and should set out what resources would be required for its success.

The goal to restore populations of less than 5% (150 species) and manage for persistence 15% (450 species) of species that are in serious or some trouble, does not meet the goal of the existing NZ Biodiversity Strategy, nor will it realise the stated purpose of the Strategy.

Partnerships with iwi, communities, landowners, philanthropists, local and regional councils and botanic gardens can only contribute a small fraction of what is necessary for our threatened species to thrive.

Achievement of the purpose of the Strategy requires the development of an All-of-Government Strategy for threatened species with ambitious goals to implement the NZ Biodiversity Strategy. Such an All-of-Government approach would join up the actions needed across government agencies, science, regional and local government on all land tenures, all freshwater bodies and in the oceans, including the EEZ.

Department of Conservation must be realistically funded to carry out the wide range of actions that are required. This would involve in our view a more than doubling of DOC's core natural heritage budget to at least \$330 million per year over the next four years.

Climate change will have significant impacts on native species, further threatening their survival. The impact of climate change on our already vulnerable species must be taken into account in all aspects of threatened species planning.

The Department needs to develop a monitoring and reporting regime to cover the implementation of the Strategy.

The proposed Strategy for the most part provides little that is new, is not underpinned by science and is less detailed and less ambitious than the NZ Biodiversity Strategy.

It fails to acknowledge that the greatest loss of our native flora and fauna is occurring on private land as a result of land-use and the department has the statutory mandate to play a significant part in advocating for its protection when this occurs.

Forest and Bird submits that it will be better to delay the release of the Strategy to enable the Department to do justice to the public submission process and credibly analyse and respond to submissions and develop a strategy with visionary goals and action plans with time frames and resourcing commitments to achieve them.

To assist in the analysis of submissions we provide comments under the Submission Form headings.

**1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

No – Forest & Bird believes that the vision should be more ambitious. It needs to honour New Zealand's international commitments;

Target 13 Of the CBD Strategic goals and Aichi biodiversity targets states:

*By 2020, the extinction of known threatened species has been prevented and their conservation status, particularly of those most in decline, has been improved and sustained."*

This is given expression though the NZ Biodiversity Strategy:

*"To restore viable populations of all our threatened and at risk species across their natural range and maintain their genetic biodiversity.*

This could be encapsulated by a vision based on that recommended by the Parliamentary Commissioner for the Environment in her recent Report on the state of our native birds.

*"The restoration of abundant, resilient and diverse species and habitats across their natural range."*

To achieve this, the Strategy's vision needs to be much more ambitious than just aiming to safeguard 20% of our threatened species and at risk species by 2030. Like Predator Free New Zealand it needs to aim high and look to safeguard all our threatened species by setting clear time frames for significant increases in the number of threatened species that will be actively managed for their restoration; i.e.:

by 2030;

- **all** threatened and at risk species will be protected (not just 20% of them), and
- **all** threatened and at risk species that are conservation dependent will be under intensive management setting them on a path to recovery.

**2. Are there additional aspects that you think should be included in the vision?**

The vision should address:

- The need to halt the loss and fragmentation of habitats that support threatened species
- Increased emphasis on improving our knowledge of the threats to, and conservation status of, species.
- Actions for threatened marine species.
- Consideration of climate change; particularly building resilient ecosystems and populations to mitigate the impact of climate change.
- The need for all Government agencies to implement the strategy.

The vision is focused on land based threatened species and actions to assist them, yet there are large numbers of sea birds threatened with extinction as well as dolphins, whales, sea lions, marine fish and



invertebrates. Only five out of 28 threatened sea birds are included in the 150 species. Nineteen species of seabirds are at risk from fishing activities, as are sea lions and dolphins.

The vision and actions of the Strategy need to incorporate an all-of-government approach to protecting threatened and at risk native species. An example is the crucial role that the Fisheries section of MPI plays in the management of fishing interactions with many threatened marine species. The actions (or lack of action) of many government agencies have significant impacts on our threatened species. All government agencies should have a responsibility under the Strategy to ensure that their policies and actions support the restoration of threatened and at risk species.

Loss and fragmentation of habitats are two key drivers of increased threat for many species. This needs to be better recognised and addressed in the Strategy. Reversing habitat loss and fragmentation will become even more important as species and ecosystems need to “move” through the landscape in response to climate change.

The Strategy should include scenarios for different climate eventualities, such as the planet reaching 2 degrees of warming if the Paris Agreement targets are met, or up to 4 degrees of warming if warming continues on its current trajectory.

### **3. Do you agree with the characterisation of the value and current state of our native species?**

We agree with the general characterisation of the current state of our native species.

However, the *Trouble in Paradise* section of the Strategy needs to recognise the impact of the commercial and recreational harvest of threatened species, such as whitebait species and long finned eels, the predation of threatened native fish by trout. It should also recognise the impacts of stock in water and wetlands, and the continued clearance or drainage of habitats of threatened species for development such as farming intensification, afforestation, urban expansion and infrastructure such as motorways.

This section should also recognise the significant impact fishing has on our marine threatened species, not only through bycatch, but also by damaging bottom trawling methods, and food competition.

The bar graph on page 12 is misleading, as it gives the impression that groups of species are better off than they are, as the “At Risk” species are excluded. It would be more helpful to show numbers of threatened, at risk, data deficient and non threatened species for each group. It also misses out whole groups for example Fungi, and includes sub species for some but not all groups.

Bird species information needs to be updated to include the 2016 conservation status.

The total number of known native species should be in the Strategy so that it is clear what proportion of our native species have been assessed. Forest & Bird understands it is likely to be less than 30%, which means that the conservation status of the majority of our native species is not known. There appears to be no strategy to assess the remainder of our species, let alone search for new species.

### **Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

Achieving the proposed strategy’s vision relies heavily on the tools of Predator Free 2050, Battle for our Birds and the War on Weeds. Forest and Bird supports each of these programs/policies. However, as they stand they are not primarily focused on threatened species and should be considered as core operational management actions for public conservation lands.

The vision for a predator-free New Zealand by 2050 – is fully supported. However, this needs to be expanded (from the Government’s Predator Free 2050 Limited’s narrow vision) to include the other key introduced predators, especially mice, hedgehogs, ferrets, weasels, dogs and feral cats. Forest & Bird is also concerned that the Government’s present Predator Free 2050 proposal is not adequately funded to achieve even its limited goals, and that this structure seriously undermines the key role of the Department of Conservation and community organisations in achieving the vision of New Zealand being free of introduced predators by the middle of the century.

“Battle for our Birds” is also supported but needs to be expanded so that when masting events occur all areas that are impacted receive pest control, rather than the present situation where only those areas with the greatest number of threatened species receive management.

Beyond the emergency “Battle for Our Bird” operations all public conservation land should receive regular sustained predator control. This would only cost around \$50 million a year (based on roughly 7 million ha receiving control once every 3 years with an annual average cost of \$7 per ha).

Some groups of threatened species may not be gaining enough benefit from current introduced predator controls which primarily focus on rats, possums and stoats and some may be at greater risk from such as mice. Battle for our Birds is presently concentrated on seed masting events in beech forests. However, there is a need for significant investment developing new science and management techniques to enable similar responses to masting events podocarp forests.

Until we have eradicated all introduced predators we need to make sure that our threatened species survive and no more species become threatened. To do this we will need regular and comprehensive, landscape – scale, predator control on land outside of the conservation estate.

The “War on Weeds” also needs to be expanded from the “dirty dozen” approach as it targets, at any one time, less than 4% of the 350 weeds that currently threaten nature. Weeds such as lupin, broom, poplar and gorse are urgently in need of control in some habitats where there are many threatened species such as braided river beds and lowland dryland sites.

Deer, thar, goats and feral pigs are also significant threats to some threatened species so their active management needs to be included in action plans to restore threatened species.

The Strategy needs to recognise that pests and diseases will become more common as climate change progresses, and make provision for this, through measures such as increased monitoring and budgets for control and biosecurity responses.

The Strategy recognises that we do not know enough about some threatened species; 3000 have yet to be given a conservation status, we don’t know how to manage at least a further 3000 and there are tens of thousands of species that have yet to be assessed. There are also a large number of species that have yet to be identified. Actions, goals and funds are needed to address this huge knowledge gap.

### Recovery Planning

The Strategy needs to require that all critically threatened species that would benefit from detailed management plans do have those plans and dedicated recovery groups that oversee the development and implementation of those plans. International best practice and NZ experience shows that specialist species recovery plans and groups are still very important for the recovery of critical species.

While the establishment of the Natural Heritage Specialist Groups may be a useful way of expanding the number of threatened species receiving recovery advice and planning, Forest & Bird considers that most existing recovery groups should be retained and updated.

#### Prioritisation of species recovery

The Strategy places too much emphasis on the need to prioritise the work between threatened species. This emphasis appears to be driven by the lack of resources, rather than conservation need.

The prioritisation tools need to be designed to meet the NZ Biodiversity strategy goal 3, to:

Maintain and restore a full range of remaining natural habitats and ecosystems to a healthy functioning state, rather than a representative range and maintain and restore viable populations of all indigenous species and subspecies (not just maximise the number of species secured from extinction), across their natural range and maintain their genetic diversity.

We need to do this to make sure that, “we restore those species at risk of extinction”<sup>1</sup> so that when 2050 comes we will be there with all our native species.”<sup>2</sup>

Incorporating threatened species management with ecosystem management is supported as this is more likely meet the goals of restoring threatened species across their natural range and halting the decline in our native species. Managing the full range of representative ecosystems and threatened species hot spots, with species level management for species requiring intensive interventions is needed.

#### Captive management

Captive management should be included as a last resort tool, only if it is essential to the maintenance of the species. The Strategy needs to be clear that wherever possible the priority for threatened species must be conservation in situ.

#### Fenced sanctuaries

While fenced sanctuaries serve a useful purpose, they should not be prioritised over conservation of threatened species in situ. The Strategy should reference the role of the many un-fenced sanctuaries or the many predator and pest free islands.

#### Translocations

Translocations can be an important conservation tool to boost genetic diversity in wild populations and expand population ranges.

Forest and Bird is concerned that there is increasing pressure from individuals, trusts and community groups to host threatened species into habitats that are not adequately managed against key threats to those species. As a consequence there is a risk that translocations may be considered for sub-optimal sites including those where predator control is not sufficient, or there is a lack of suitable habitat. Translocation policies are needed to ensure consistency, transparency and effectiveness of translocations.

As the Parliamentary Commissioner for the Environment’s recent report notes, translocations are expensive and risky and should be evaluated against the overall benefit for the species, as well as against the benefit of using the same resources to control predators, or to provide other assistance in the in situ restoration of threatened species.

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<sup>1</sup> The Honourable Maggie Barry – From the Minister – Draft NZ Threatened Species Strategy

<sup>2</sup> Lou Sanson - From the Director General - Draft NZ Threatened Species Strategy

### Regulation

This section needs to set out how existing and new legislation and regulation will be used and developed to underpin attainment of the goals of the Threatened Species Strategy.

The development of native threatened plant and habitat protection legislation is supported.

A key issue for ensuring the effectiveness of regulation in protecting threatened species relates to the adequacy of monitoring, compliance and enforcement. The proper implementation of existing laws and regulations at the central, regional and local government levels would help considerably for many threatened species.

Development of a National Policy Statement on indigenous biodiversity is supported provided it sets bottom lines for biodiversity protection on private land, that will achieve the vision and the goals needed to protect and enhance all our Threatened and At Risk native species and prevent others becoming threatened.

The Strategy relies too heavily on Freshwater reforms to safeguard freshwater species. However the NPS-FM 2014 and the new Clean Water Package 2017 do not fully provide sufficient thresholds 'to safeguard the life-supporting capacity and indigenous species of freshwater, nor does it include groundwater.

Some bottom lines, particularly nitrate, have been set at levels which are toxic to aquatic life. These levels reflect ecological collapse as a threshold for acceptable water quality. Of particular concern is that regional plans have been setting limits at these unacceptable bottom lines, most notably in spring-fed rivers on the Canterbury Plains. The effect of this is that these rivers have no chance of ever providing healthy ecosystems.

While the proposed changes to the NPS-FM 2014 (included in the Clean Water Package 2017) include targets for stock exclusion to waterways, they do not cover any other types of habitat destruction, for example wetland drainage, dredging streams, riparian vegetation clearance, engineering structures such as dams, weirs and culverts all of which destroy freshwater habitat, including habitats of threatened species. Existing legislation is not working well for our threatened freshwater species.

## **5. Are there other tools we could use to help us achieve the vision?**

### Predator control tools that can be used over large areas

Forest and Bird is a strong supporter of landscape scale aerial 1080 and strongly endorse its continued use and constant drives for efficacy and public awareness raising to maintain its broad acceptability.

Recent concerns over kea and kaka and Good Nature traps has highlighted the need for all predator control techniques, including new traps, to be field tested (just as toxins are) before deployment.

### Management innovation

Some of our greatest improvements in threatened species management over the last few decades has been due to management/operational innovations such as the use of GPS positioning to improve the accuracy of aerial toxin application, the development of 'pre-feeding' for poison operations, and the development of Operation Nest Egg technology for safely removing eggs from the wild where they faced high degrees of predation.

### The role of the Department of Conservation

The Strategy needs to prioritise the Department of Conservation's statutory role of carrying out advocacy for the protection of our indigenous flora and fauna and their habitats. This role is particularly important when seeking to protect and restore threatened species and their habitats on private land. The Strategy should require the Department to do more of this crucial advocacy.

The Department should also utilise the tenure review process to secure high country threatened species habitats and ecosystems in Crown ownership and control.

#### Adequate resourcing.

The best possible tool is to ensure that the Department of Conservation is adequately resourced to undertake all the steps necessary to restore all threatened and at risk species and to prevent others from becoming threatened.

#### Monitoring of the Strategy's implementation

An important tool for ensuring the effectiveness of the Strategy is to include methods to monitor the implementation and achievements of the Strategy.

### **6. Will the proposed goals help us achieve the vision and assess our progress?**

The proposed goals need to be considerably more ambitious, more in line with the aspirational goals of a predator free New Zealand.

Goal 1 is not clear – are the 500 and 600 species both threatened and at risk species and are the 150 prioritised species a subset of the 500-600 species? Given that there are 600 threatened species on public conservation land and that DOC currently manages 483 species is this really a 40% increase on today?

There are no goals relating to the need to enhance all of our threatened and at risk species.

Goal 4 fails to set a target for assessing data deficient species

### **7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

The goals could be amended to include:

- Enhance the populations of more than 50% of our threatened species so that they are on the road to recovery by 2025.
- Manage all threatened and at risk species requiring conservation intervention for protection so that no species should become more threatened.
- All threatened and conservation dependent species should be actively managed for recovery by 2030.
- Ensure that no species goes extinct.
- Reassess the list of priority species from the full list of threatened and at risk species so that the algorithm is applied to all species not just the species currently worked on.

- Reduce fishing bykill of marine threatened species to ensure their recovery to non threatened status.
- Select 230 data deficient species every year so that by 2030 there are no data deficient species.
- Assess 100 threatened species per annum to determine conservation actions required so that by 2050 there are no threatened species without a conservation prescription.
- As only 13,000 species have been assessed for their conservation status, and there are estimated to be 70,000 terrestrial species,<sup>3</sup> not including marine species, there is a need to understand their status. Develop a goal to assess the remaining unassessed species.

## 8. Have we identified the right strategic themes?

Forest and Bird agrees that the Strategy needs to be backed by science, however the strategy is not currently underpinned by science, as the priority species have been pulled from a list of species the Department is already working on, and science has not necessarily determined that original choice.

Amend the Managing ecosystems at scale to protect species to include taking account of climate change.

The following additional theme should be included:

- Uniting all Government Agencies in an “all-of-government” response and commitment to threatened and at risk species, to ensure all native species thrive.
- Building the needs of threatened native species into climate change policy developments, as well as considering the impact of climate change in all threatened species recovery planning.

## 9. Do you agree with our top 10 actions? -

Yes with additions and amendments, as set out below.

## 10 Are there any other actions that should be included, and any actions that should be removed?

In addition to achieving the Predator Free New Zealand goals and the Battle for our Birds response to masting events;

Increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control by 2025.

Amend Action 2 to include:

Develop protocols to ensure that all trap designs and innovations are field tested to assess their potential risks to threatened and at risk species prior to their deployment.

Amend Action 5 to introduce fishing regulations to achieve zero bycatch of threatened species in fisheries.

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<sup>3</sup> <https://teara.govt.nz/en/native-plants-and-animals-overview/page-1>

Amend Action 7 Identify and publish a portfolio of priority areas for threatened species both on and off the public conservation land and develop and implement plans for their protection and enhancement.

Amend Action 8 to: Select 230 data deficient species every year for assessment, and develop conservation prescriptions for 100 threatened species par annum and carry out assessments of remaining unassessed species.

Amend Action 9 to: Ensure that national recovery planning systems integrate matauranga Maori and are implemented to achieve threatened species goals - and add; Maintain recovery groups and establish recovery plans and groups for all threatened species requiring specific management to restore their populations.

Add to Action 10 the development of a system for monitoring and regular public reporting on costs and progress towards the goals.

Add an action to identify and take opportunities to preferably purchase, or covenant habitats of threatened species.

Add an action that: DOC will carry out its statutory advocacy functions to advocate to halt the destruction of habitats of threatened and at risk species.

**11. Have we identified the right number of priority species?**

(Circle or highlight one) • Too many • About right • Too few

**Comments:**

The number of threatened species identified needs to be driven by what is actually required to safeguard our threatened species and ensure that their populations are resilient and thriving, rather than fitting the prioritisation to the current lack of funding.

**12. Have we identified the right priority species? No**

Identification of the right priority species is constrained by only identifying priority species from amongst the species currently managed. There is a strong bias towards terrestrial species. Seabirds are poorly represented, as are dry land and limestone threatened plants, some groups such as fungi (50 species listed as nationally critical in 2002) are missing entirely.

All the threatened species and those that are at risk and conservation dependent should be prioritised for enhancement by 2030

**13. Do you think other species should be prioritised ahead of the ones listed? And why?**

The algorithm should be applied to all species to determine priorities, not just those that are currently being managed, as we understand these species have not been through a robust scientific selection process.

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

No – For all the reasons stated above.





# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

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### Submitter details:

Name of submitter or contact person:	[Redacted]
Organisation name: <i>(if on behalf of an organisation)</i>	Fungal Network of New Zealand Inc.
Email:	[Redacted]
Signature: <i>(we accept a typed signature if no electronic signature)</i>	[Redacted]

## Submission:

### You can answer all or some of the questions.

**1:** Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

With disappointment, this Strategy is focussed only on species that have a public profile, and have been previously prioritised by DOC. It lacks the scientific rigour that should be fundamental to a strategic national plan, instead adopting a subjective sociological-based approach.

**2:** Are there additional aspects that you think should be included in the vision?

Quoting from the Strategy's Vision statement:

“This Strategy is underpinned by an ethic of partnership between government agencies and Māori. Iwi are the indigenous kaitiaki or guardians of the natural world (Te Ao Tūroa), including the plants, animals and fungi of New Zealand.”

We assume therefore that this Strategy document has mistakenly omitted any fungi from among the 150 priority species, and request that this be addressed in the forthcoming Strategy revision. It is appropriate to reflect on iwi guardianship of our plant, animals, and fungi, yet just 3 pages later the first chapter “A Land Apart” begins with the statement: “Much of New Zealand’s flora and fauna is found nowhere else on Earth”. Please consider re-wording to “... flora, fauna, and fungi ...”

**3:** Do you agree with the characterisation of the value and current state of our native species?

Quoting DG Lou Sanson in the Foreword to the Strategy:

“When 2050 comes, we want to be there with all our native species, not just a fortunate, charismatic few. Our nature is a package. We cannot leave the future of our native species to chance.”

Indeed, there is great value in the non-charismatic species. Overlooking a kingdom of life, the fungi, in choosing the 150 priority species devalues a substantial number of our native species. Fungi are important in decomposition and nutrient cycling, nutrition of plants, invertebrates, and vertebrates, and as taonga species; fungi were used by Māori for food, medicine, tattooing, korero, and as environmental indicators. And our internationally acclaimed \$50 banknote features a Tūhoe design incorporating the blue mushroom (the taonga werewere-kōkako) along with the kōkako, another taonga.

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

5: Are there other tools we could use to help us achieve the vision?

6: Will the proposed goals help us achieve the vision and assess our progress?

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

8: Have we identified the right strategic themes?

9: Do you agree with our top 10 actions?

**1** Are there any other actions that should be included, and any actions that should be removed?

It is important that actions address NZ’s biodiversity rather than a biased assessment. On p. 13, “To protect our biodiversity, it is important to know whether a plant or animal is a distinct species, ...” This same importance applies to fungi from both a conservation and biosecurity standpoint – and is the reason that the government funds for fungal systematics research.

The inter-connectedness of life is mentioned on p. 10, including fungi: “So, when a beetle, an orchid or a bird disappears forever, it matters”. The risk of fungal extinction matters also – an example being a large bracket fungus (*Ganoderma* sp. ‘Awaroa’) that grows on pukatea, known from only 3 specimens and last seen in 1972 despite searches for it by staff from DOC, Waikato University, Landcare Research, and Scion, and by public groups.

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right • Too few

**Comments:**

## 1 : Have we identified the right priority species?

There is a fundamental oversight in methodology to identify priority taxa to include in the Threatened Species Strategy, questioning the scientific validity of the process used. An expected first requirement would be that the selected priority taxa at least include threatened representatives from all three kingdoms of NZ's macroscopic biodiversity – i.e., representatives from the animals, plants, and fungi. This accords precisely with the stated selection criterion: “securing the widest range of taxonomic lineages in NZ” and further with the aim to: “select on the basis of optimising taxonomic representation to secure as many orders, families, and genera as possible, ..” Applying these standards, while omitting an entire major kingdom, suggests a significant unscientific bias by DOC towards the other two major kingdoms.

While DOC does not employ experts on fungi, national expertise in fungal conservation resides and is active in Landcare Research. Staff there are working with Rod Hitchmough and Jeremy Rolfe (DOC) on a (protracted) kingdom-level assessment of the conservation status of over a thousand indigenous fungal species – with the previous assessment indicating over 50 species with Nationally Critical status. As a kingdom, NZ's indigenous fungi outnumber NZ's indigenous plants – and conservation status of NZ's indigenous fungi is now recognised globally with the first two NZ species on the IUCN Red List. In addition to fungal species on DOC's threat classification lists, several hundred fungal species have data deficient status, and will be a subject for the Strategy's fourth goal to: “Support research ... that helps us to better understand data deficient species”

## 1 : Do you think other species should be prioritised ahead of the ones listed? And why?

We recommend that DOC include a minimum of **five** species of NZ fungi among the 150 priority species in the Threatened Species Strategy - representative of fungal species currently categorised as Nationally Critical on DOC's Threat Classification list. Suggestions include: *Claustula fischeri* (the only species of a monotypic family Claustulaceae) and *Boletopsis nothofagi*. As with most organisms, tangible practices can be developed through scientific research to improve the conservation status of selected threatened fungi.

We can provide a list of 1480 NZ endemic fungal species. These represent about 20% of the 8,000 recorded species of NZ fungi, of an estimated NZ fungal diversity comprising 20-24,000 species (based on global ratios of fungi : vascular plants).

**1** : Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

Appropriate central government resourcing is essential to the success of this strategy. Dependency on the philanthropic sector abdicates the core responsibility of government and its key agency DOC.

**15**: Do you have any further comments regarding the draft Strategy that is not covered above?

Fungi are sometimes misunderstood because they include introduced species that cause plant diseases. Yet, vertebrates also include introduced species that devastate our indigenous vertebrates, invertebrate, plants, and fungi. Myrtle rust is the latest invader of note, arriving from Australia on wind currents after Australia failed to control an earlier discrete introduction.

In this regard, a correction is required in the Strategy, where kauri dieback (p. 30) is stated as being caused by a fungus. As is well known among DOC science staff, the causal agent *Phytophthora agathidicida* is a chromist, not a fungus.

Society awareness: In addition to research expertise on fungal conservation, there is a community of NZ citizen scientists keenly interested in fungi – as evidenced by participation in the annual NZ Fungal Foray (now in its 31st year) that attracts up to 60 participants from throughout NZ and overseas, in public fungal forays by environmental societies, and in fungal contributions to NatureWatch.

Thank you for this opportunity to provide feedback on the Draft Strategy.



[www.funnz.org.nz](http://www.funnz.org.nz)

**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 4:59 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
 Organisation: Canterbury Botanical Society  
 Email: [REDACTED]

q1: The TSS does not contain enough detail or explain clearly what DOC plans to do to protect our threatened plant species and their habitats.

The main focus of the draft Threatened Species Strategy (TSS) appears to be the Predator Free 2050 initiative, however predator control will not bring major benefits for conservation of most of our threatened plant species (i.e. species classified as Threatened or At Risk under the NZ Threat Classification System), as the main threats they face are habitat loss, fragmentation and modification (often through intensification of land use), browsing mammals (ungulates, rabbits, hares, possums), invasive weeds, invertebrate pests, and pathogens (e.g. myrtle rust, kauri dieback disease).

Managing ecosystems at a scale to protect species is an admirable long-term goal, however in the short term we are still struggling to hold onto some critically threatened species that survive at only one or a few sites.

Looking at the species/protection graph it is clear that protecting only 39 plant species will not prevent the next most vulnerable cohort sliding into a more highly threatened category.

We support the vision and goal of the TSS to integrate mātauranga Māori into threatened species management and to develop a partnership between government agencies and Māori.

q2: Many of these plants need conservation genetic research to help understand the population to guide management. When will this happen? Who will pay for this?

q3:

q4:

q5: There is no mention in the TSS about providing legal protection for threatened plants (c.f. the Wildlife Act), however legal protection would be an important tool in saving some species from extinction, particularly on private land. For instance, making it illegal to deliberately destroy threatened plants and their habitats.

q6:

q7:

q8:

q9:

q10:

q11: toofew

q11comments: Only 39 out of the 150 species listed under Goal 2 are plants. This is a relatively low proportion of the total number of threatened species in NZ compared to other taxa.

q12: It is surprising that 7 of the 39 plant species are in the same genus (*Lepidium*) - this means that other genera are being left out (e.g. *Anemanthele lessoniana* is a monotypic genus that perhaps should be on the list).

Considering how many wetlands have been lost in NZ it is surprising that there are not more wetland plant species on the priority list, for example, *Triglochin palustris*.

We are surprised *Pachycladon exile*, *Myosotis lytteltonensis* and *Leptinella nana* were not chosen by the algorithm.

*Pseudognaphalium ephemerum* is not even established as a distinct entity, and we do not think it warrants being on the list.

q13: *Australopyrum calcis* subsp. *calcis* is much more endangered than *A. calcis optatum*, which we don't have any population trend data on right now.

q14: No. The goals and actions in the TSS are not wide enough in its scope to manage the majority of our threatened native plant species and prevent them from declining further in future.

Goal 4 – We support further research into understanding Data Deficient species, however providing extra funding for the National Science Challenge is not the best way to achieve this. There are a wide range of organisations, companies, and individuals who have considerable experience and capability in this area and would be able to achieve a lot more toward this goal for far less funding than Crown Research Institutes would require.

q15: As far as we are aware there has been no additional budget announced to implement the TSS. In order for reasonable improvements in the conservation of our threatened native plants (or even to maintain the current status of many species), substantial additional funding must be made available.

**Submission on NEW ZEALAND'S THREATENED SPECIES STRATEGY –Draft****31/7/2017**

Managing threatened species is a highly technical issue which needs to be addressed in the context of what is known to date (references published, credible science) and usual formalities that aid clarity (e.g. definitions, such as invader) and scrutiny (e.g. authors and their credentials).

This document is a lightweight, public-oriented document which makes no reference to published science. Further investigation into the underpinning Conservation and Environment Science Roadmap document still did not uncover any scientific reviews.

New Zealand's Natural Heritage is facing a critical point whereby widespread poisoning has been carried out for decades, and the rate and extent is ever-increasing. Of the very few reliably monitored native species (6 species of birds), two are known to suffer significant losses in 1080 operations (12% of kea and 9% of fernbirds, on average).

1080 is harmful to a very broad range of organisms including bacteria, fungi, plants, nematodes, insects, birds, snails and mammals. Sub-lethal effects include damage to reproductive structures, birth defects and organ damage and can be cumulative. Toxic effects may possibly occur at concentrations too low to detect with any validated analytical methods, according to the USEPA, 1988. Furthermore there are well-documented increased pest impacts following poisoning due to mice and rat numbers increasing markedly, and prey-switching by predators (Pollard, 2016).

Pollard, J.C., 2016. Aerial 1080 poisoning in New Zealand: Reasons for concern.  
[https://www.researchgate.net/publication/308712508 Aerial 1080 poisoning in New Zealand Reasons for concern](https://www.researchgate.net/publication/308712508_Aerial_1080_poisoning_in_New_Zealand_Reasons_for_concern) 17pp.

The strategy document shows how badly ecological science needs to be brought into conservation. A few examples, where critical information and discussion is missing, are:

**“Uniting against invaders on a landscape scale”** invader is not defined, and invasion is natural, e.g. fantails and silvereyes arrived in New Zealand fairly recently – unassisted, from Australia.  
<https://teara.govt.nz/mi/photograph/9917/fantail> . NZ's ecology has been dealing with “invader” kiore and its plagues for centuries, for example King, 1984:

*“These bonanzas happened every three to five years, after heavy seedfalls of native trees. An abundance of seed allowed the kiore to increase suddenly (but temporarily) to very high numbers. The old-time hunters were well aware of this connection, 20 and that periodic swarms were always characteristic of kiore; in the South Island, these irruptions continued to the 1880s, that is, into the era of reliable recording.”*

King, C 1984. *Immigrant Killers. Introduced Predators and the conservation of birds in New Zealand* Oxford University Press. 224 pp.

**“Manage 500 species for protection by 2025 – a 40% increase on today – and 600 species for protection by 2030”**

**“Enhance the populations of 150 prioritised threatened and at risk species by 2025”**

**“Not all conservation projects are of equal value. Some ecosystems contain numerous threatened species and a single project could achieve benefits for a greater number of species than other investments. Conservation, like any other investment, needs to be about smart targeting and maximising the benefit from scarce resources”**

Ecological advice suggests preserving habitats, rather than species: (King, 1984):



"I think we should accept predators as permanent members of the New Zealand fauna; attempt to limit the damage they can do in the most sensitive remaining areas, but not waste money on impossible, general control of their populations; recognize that large-scale predator control on the mainland is not now necessary, even if it were possible, since the processes of nature are repopulating New Zealand with birds that are able to live with predators, while the rest are either adapting or have already gone; vigorously defend what isolated remnants of the ancient fauna are actually defensible in the long term; and temper our regret at the passing of the old endemics with positive appreciation of the new colonists."

"Some few species, such as the South Island saddleback, the black robin and the stitchbird, have been brought back a step or two from the brink of extinction over the last few years. But while attention has been focussed on them and not on the greater importance of habitat conservation, the destruction of mainland forests and swamps has continued unchecked; so it is probable that in the course of the same few years many smaller, less appealing species have been pushed over the brink, some even before they were known to science. Conservation is the prime task, and arguments for establishing reserves should be based primarily on the need to conserve whole ecosystems."

**The 2025 goals are to:**

**1. Increase by 1 million hectares the area of mainland New Zealand land where predators are suppressed, through Predator Free New Zealand projects**

This assumes that predator suppression has had desirable effects, even though no evidence has been provided.

DoC has not recognised the documented, strongly negative effects of 1080, including deaths of native birds, large numbers of mice immediately after poisoning, rat numbers building to plague levels at some stage within two years usually, and prey-switching by stoats to eating birds (Pollard, 2016).

**2. Demonstrate that predator eradication can be achieved in areas of mainland New Zealand of at least 20,000 hectares without the use of fences**

This goal is setting out to demonstrate a preconceived idea, that has had no proper scientific consideration. If using poisoning, it appears a poor idea, because of all species present, rats are most likely to flourish after poisoning (being highly invasive, rapidly breeding and generalist feeders).

3. Achieve eradication of all mammalian predators from New Zealand's island nature reserves. A total absence of predators may make birds extremely vulnerable due to not having experience of them, rather than learning avoidance strategies.

, with disastrous consequences in a sanctuary containing precious rare birds (eg saddlebacks were eliminated at Orokunui)

**4. Develop a breakthrough science solution capable of eradicating at least one small mammal predator from the New Zealand mainland.** Where is the discussion of the ecological implications of this?

**The Department of Conservation (DOC) has detailed knowledge of where many species**

**live, the threats that exist in different areas and the positive impacts that will result from different actions such as predator control. The impact of various actions on many species can be modelled and costed. By using these tools, Predator Free 2050 Ltd will be able to assess how its funding is achieving the best results for threatened species and helping to meet the goals set out in this Strategy.**

In an overview of its own ship rat, possum and stoat control programmes (Brown *et al.* 2015), DoC listed many problems internal to their organisation, which included adoption of best practise was patchy; (3) not all DoC control operations were reported; (4) failure to follow best practice; (5) insufficient toxin; (6) budget insufficient; (7) breakdown in communication between technical advisors and operational staff leading to poor design and inconclusive outcomes; (8) did not fully understand the relationship between forest mast events and rodent population responses to these; (9) had too few measures of the long-term benefits of 1080 use to different populations of native species; (10) lack of robust monitoring and follow through; (11) legal requirements not always met; (12) how variable operations had been was unknown, as not all control operations were written up; (13) average costs for ground-based trapping and toxin operations were difficult to obtain because they were not consistently recorded.

Brown, K, Elliott, G, Innes, J & Kemp, J 2015. *Ship rat, stoat and possum control on mainland New Zealand. An overview of techniques, successes and challenges.* Department of Conservation report. 40 pp.

**Because of their immense thirst, they deprive sensitive catchments of badly-needed water. When wildings displace tussocks, they can reduce water availability by more than 40%. Stemming their spread is essential if we're to halt biodiversity decline and maintain populations of threatened species.** Assumes incorrectly that wilding forests, eg larches in the Shotover river area, have poor biodiversity.

**Predator control using trapping for stoats and aerially applied 1080 for rats, stoats and possums can reverse these declines. Nesting success of mohua during a rat and stoat plague in the Dart Valley in 2014, which was treated with aerial 1080, was 89% of 13 monitored nests.**

Increased nesting success may actually show that populations have been severely culled (Nilsson 1984; Arcese & Smith 1988). For instance in their review Eason *et al.* (2011) described how a population of tomtits estimated to have been culled by 79% by an aerial 1080 operation had shown enhanced nesting success the following season, with "*pairs rearing two, and in some cases, three broods*" (p. 12).

Nilsson, SG 1984. The evolution of nest-site selection among hole-nesting birds: The importance of nest predation and competition. *Ornis Scandinavica* 15(3): 167-175.

Arcese, P & Smith, JM 1988. Effects of population density and supplemental food on reproduction in song sparrows. *Journal of Animal Ecology* 57: 119-136.

Eason, C, Miller, A, Ogilvie, S & Fairweather, A 2011. An updated review of the toxicology and ecotoxicology of sodium fluoroacetate (1080) in relation to its use as a pest control tool in New Zealand. *New Zealand Journal of Ecology* 35(1): 1-20.

**As part of the Battle for our Birds programme more than 50,000 ha of key mohua habitat are repeatedly treated with 1080 and trapping. In the Landsborough Valley, which has been trapped**

**and repeatedly treated with aerially applied 1080, mohua have increased from a count of 14 to 300 along monitoring lines, a more than 20-fold increase since predator control began.**

This is misleading: O'Donnell & Hoare (2012) studied native birds in the Landsborough Valley subjected to *continuous* ground trapping for stoats *plus* four aerial 1080 operations over 11 years. Reported results were decreases in four species, no change in two, and increases in nine. The authors stated that "*we are unable to apportion increased abundance of mohua to a particular component of the pest control programme...*"

O'Donnell, C.F.J. & Hoare, J.M., 2012. Quantifying the benefits of long-term integrated pest control for forest bird populations in a New Zealand temperate rainforest. NZ Journal of Ecology 36: 131-140.

**Dilution is by far the fastest and most common way in which 1080 biodegrades in the environment.**

Chemistry definition

Dilution: the process of reducing the concentration of a solute in solution

Biodegradation: the disintegration of materials by bacteria, fungi, or other biological means

**1080 is of limited use in other countries because there are native mammals that they cannot risk harming.**

This is misleading because 1080 is a broad spectrum toxin, for instance it kills invertebrates too:

An experimental study found a severe negative impact of aerial 1080 on a wide range of terrestrial invertebrates, persisting for at least a year in some species (Meads, 1994, unpubl.). However followup studies by DoC, severely compromised by poor design, have been used erroneously since to claim a lack of effect (Whiting-O'Keefe & Whiting-O'Keefe, 2007).

From The ERMA Reassessment, 2007:

P 427 Agency App. C "100% mortality [of aphids on broad bean plants growing in 0.1 mg 1080 in 400g sand], plants remained toxic for at least 10 days..100% mortality [of aphids on broad bean plants grown in 0.00005% 1080 culture solution]"

425 Agency App. C "Most exposed [native] cockroaches died during the 14 day period [after being fed 0.08% 1080 cereal bait]"

723 Agency App. N "Due to the level of uncertainty in the toxicity data for invertebrates, and the lack of information on the amounts of baits likely to be eaten, the Agency has not attempted to assess direct exposure to invertebrates"

Meads, M., 1994. Effect of sodium monofluoroacetate (1080) on non target invertebrates of Whitecliffs Conservation Area, Taranaki. Unpublished; Landcare Research Contract Report: LC9394/126.

Whiting-O'Keefe, Q.E., Whiting O'Keefe, P.M., 2007. Aerial Monofluoroacetate in New Zealand's Forests. An appraisal of the scientific evidence.

<http://1080science.co.nz/wp-content/uploads/2016/06/Whiting-Okeefe-2.pdf> 88pp.

Introducing more species to provide “**biocontrol**” seems very unwise, as introduced species have already caused so much trouble for New Zealand. At the very minimum, a robust technical review of success and failures and other relevant information should be provided.

**It is generally accepted that rats, possums and stoats are the main causes of biodiversity loss in New Zealand.**

Scientific evidence should be provided, including the relative contributions of other factors, eg habitat loss, wetland drainage, poisoning. The same needs to apply to riverbed ecological systems.

I hope my concerns regarding the lack of science being used in NZ conservation are recognised and acted upon.

# New Zealand's Threatened Species Strategy: submissions for consultation

#167

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Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
*(if on behalf of an organisation)*

Email:

Signature:   
*(we accept a typed signature if  
no electronic signature)*



**Submission:**

You can answer all or some of the questions.

**1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

*No – This vision lacks ambition when it comes to protecting our threatened and at risk native species.*

*To achieve this, the Strategy's vision needs to be much more ambitious than just aiming to safeguard 20% of our threatened species by 2030.*

**2. Are there additional aspects that you think should be included in the vision?**

Yes

- *the need to halt the loss of habitats that support threatened species*
- *Increased emphasis on improving our knowledge of the threats to, and conservation status of, species.*
- *Actions for threatened marine species.*

**3. Do you agree with the characterisation of the value and current state of our native species?**

*Yes I Agree with the value of our biodiversity.*

**4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

*The Strategy places too much emphasis on the need to prioritise the work between threatened species. This emphasis appears to be driven by the lack of resources, rather than conservation need. All threatened and conservation dependent species need to be managed for protection and there needs to be flexibility to be able to work on species that may not have been prioritised, but where an opportunity or a necessity arises.*

*Captive management should only ever be a last resort tool, as the priority for threatened species must be conservation in their natural habitats*

**5. Are there other tools we could use to help us achieve the vision?**

*The best possible tool is to ensure that the Department of Conservation is adequately funded to undertake all the steps necessary to restore all species at risk of extinction and to prevent others from becoming threatened.*

**6. Will the proposed goals help us achieve the vision and assess our progress?**

*No, the proposed goals need to be considerably more ambitious.*

*There are no goals to achieve enhancing all of our threatened and at risk species, or increasing knowledge about the many data deficient species so that no species are data deficient.*

**7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

Yes,

- *Manage all threatened species requiring conservation intervention for protection so that no species should become more threatened*
- *All threatened and conservation dependent species should be actively managed for recovery by 2030.*

**8. Have we identified the right strategic themes?**

*The following additional theme should be included:*

- *Uniting all Government Agencies in an “all of government” response to threatened and at risk species to ensure all native species thrive.*

**9. Do you agree with our top 10 actions? -**

*Yes with additions as detailed below.*

**10 Are there any other actions that should be included, and any actions that should be removed?**

*In addition to achieving the Predator Free 2025 goals and the Battle for our Birds, increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control.*

*Introduce regulations to achieve zero bycatch of threatened species in fisheries.*

*Expand the War on Weeds to include lupins, broom and willow on river beds and their margins*

**11. Have we identified the right number of priority species?**

(Circle or highlight one) • Too many • About right • **Too few**

**Comments:**

*The priority list of threatened species must be based on the conservation needs of all species rather than fitting the prioritisation to the current lack of resources.*

**12. Have we identified the right priority species?**

**No**

*All the threatened species and those that are at risk must be prioritised.*

**13. Do you think other species should be prioritised ahead of the ones listed? And why?**

*Prioritisation should be dependent upon threat status, with account taken of the imminence of threats and be less influenced by the cost of managing them.*

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

*The vision lacks ambition to conserve NZ's threatened species. It only proposes to increase the populations of 150 out of 800 threatened species at risk of extinction, and manage 600 out of a further 2,200 species at risk of decline. The vast majority of threatened and at risk populations which need help now are not covered by the Strategy's proposals for action.*

*Additionally the Strategy fails to commit all government agencies to commit to achieve the strategy's goals.*



**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 5:00 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
Organisation: Canterbury Botanical Society  
Email: [REDACTED]  
q1: NO.

There was no announcement of additional budget to implement it.

Looking at the species/protection graph it is clear that choosing to protect 100 plant species will not prevent the next vulnerable cohort sliding into the highest threat category.

No indication of the workflow required to develop the foundation for a plant strategy. for example, at what stage does legal protection of rare plants need to be in place?

The strategy needed a review of what field management has been effective and what has failed to date, and why.

Timeline for policy for best -practice for seed banks, ex-situ cultivation strategy, in conjunction with the Botanic gardens conservation strategy, and guidelines for nurseries to prevent hybridization. That all needs funding of course.

Looking at the species/protection graph it is clear that choosing to protect 100 plant species will prevent the next vulnerable cohort sliding into a high threatened category.

I am surprised *Pachycladon exile*, *Myosotis lytteltonensis* and *Leptinella nana* were not chosen by the algorithm, all are close to being functionally extinct. Just because it is receiving management and is in a QEII covenant does not mean that it is not endangered.

q2: Considering how many wetlands NZ has drained I thought that there would be more wetland species listed, for example, *Triglochin palustris*.

Many of these plants need conservation genetic research to help understand the population to guide management. When will this happen? Who will pay for this?

q3: It would have been better to hold off this strategy the next iteration of the Threatened and Uncommon plants list was published so new information and new trends could be incorporated..

q4:

q5:

q6: No. It needs a date for the adoption of a new policy to provide legal protection for critically threatened plants, and reinstatement clauses if a threatened plants or their habitats are wiped out.

q7: provide plant species and their habitats with a well-understood mechanism to protect them. It is unclear how the various agencies are meant to work together to fund protection of threatened plants on private land.

q8:

q9:

q10: Fund Seed bank programmes. Establish conservation populations in conjunction with Botanic Gardens. Store native species in the International seed banks.

q11: too few

q11 comments: No. There just is not enough species on the list to stop a decline. All Nationally Critical species on the next iteration of the Plant Threat list should have been included.

q12: No. There is an assumption that species receiving conservation management are in recovery.

*Pseudognaphalium ephemerum* may not be a distinct entity. This strategy needs to fund conservation genetics to solve this mystery.

q13: Species on the cusp of extinction. Some are receiving conservation management but more funds and effort may be needed to hold off extinction. Examples from Canterbury are: *Myosotis lytteltonensis*, *Leptinella nana*, most limestone endemic plants, ephemeral tarn species.

[REDACTED]

q14: No it does not.

[REDACTED] how bizarre that saving a species from extinction is now a volunteer activity. BOTSOC do more to find and record endangered species on private land through their field trips than DOC do, but we don't have the resources to carry out conservation management. There has to be an education component to help plant nurseries understand the role they can play in conserving local plant genetics, providing best-practice restoration advice and supporting threatened plant work. Let's start with a national eco-sourcing strategy and tracking system.

q15: Conservation of threatened species is a specialist, time-consuming science involving systematists, researchers, managers, resource management planners, politicians, tangata whenua, and landowner. It needs new, dedicated funding to make a difference to the decline of the indigenous threatened biota of Aotearoa into oblivion.

# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

---

### Submitter details:

Name of submitter or contact person:	[REDACTED]
Organisation name: <i>(if on behalf of an organisation)</i>	Rainbow Springs
Email:	[REDACTED]
Signature: [REDACTED] <i>(we accept a typed signature if no electronic signature)</i>	



**Submission:**

**You can answer all or some of the questions.**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

Yes

2: Are there additional aspects that you think should be included in the vision?

3: Do you agree with the characterisation of the value and current state of our native species?

Yes

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

*We would like to see the section here titled “captive management” on page 20 changed to ‘A Partnership with the Zoos, Wildlife Parks and Aquariums’ to better reflect the MOU which is in place- similar to Botanic Gardens which is headed similarly on page 21*

5: Are there other tools we could use to help us achieve the vision?

6: Will the proposed goals help us achieve the vision and assess our progress?

*They will assist but DOC needs to utilise all partners and stakeholders according to their specialist skill sets. For Example ZAA members are specialists in husbandry, conservation breeding, species management etc. and this should be reflected in the strategy. It seems that breeding for restoration is still not seen as a major contributor to species survival and we would like this to be highlighted more.*

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

8: Have we identified the right strategic themes?

Yes

9: Do you agree with our top 10 actions?

Yes

10: Are there any other actions that should be included, and any actions that should be removed?

*Advocacy for species protection - the whole community needs to understand the way they can help – it's not going to be all down to the scientists and government officials to save our species. New Zealanders need to be part of the conversation – zoos, wildlife parks and aquariums can help with this given that we see over 2million visitors each year in NZ.*

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • *About right* • Too few

**Comments:**

12: Have we identified the right priority species?

*Currently, yes*

13: Do you think other species should be prioritised ahead of the ones listed? And why?

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

*Yes as long as the implementation phase is well organised and all players consulted. Working together in partnership pg 39 needs to go beyond community to those organisations which can add value to the science/ knowledge needed.*

15: Do you have any further comments regarding the draft Strategy that is not covered above?

*Kiwi's for Kiwi Operation Nest Egg is helping halt the decline of all Apteryx species and as a result is preserving valuable genetic diversity which would otherwise be lost in areas of sub-optimal predator control. Over 20 years Rainbow Springs have hatched over 1650 chicks for release to the wild.*

## Draft Threatened Species Strategy Submission

I welcome this opportunity to contribute my views to the Draft Threatened Species Strategy Submission.

I congratulate the Minister of Conservation, the Director-General of Conservation and the Department for recognising the unique value of our biota and the need for a long term strategy to protect them. I commend the methodical way you have developed and prioritised the strategy.

I support

P3). Money spent on the strategy should be seen as an investment, not an expense. At the moment tourism and commercial recreation entities exploit the conservation estate, but seldom enhance them in return.

P4). Agree with the strategy as set out. A higher priority should be given to focusing beyond public conservation land.

P 5). Goals

We need a goal to protect habitats and ecosystems beyond public conservation land - a goal to protect ecosystems and biodiversity on a wider scale. Organisms do not conform to boundaries on maps. Everything is connected to everything else. You cannot protect an organism long-term without protecting the ecosystem which it is a part of. This can only occur if habitats are protected from harmful development as well as predators and invasive species. This applies particularly to waterways.

14). Involving the public

To be successful resources of time and expertise need to be back up public involvement. Often the public is left to do what DOC is not financed to do.

P14). Partnering with business.

This should be only in ways that enhance conservation values and biodiversity, and beneficial public use of the conservation estate. Often business gets the advantage but Conservation gets the bill.



**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 5:43 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Name: [REDACTED]  
Organisation:  
Email: [REDACTED]

q1: Yes

q2: No

q3: No

q4: No

q5: Trapping and targeted poisoning of pests is the only method that must be used to save our birdlife.

Indiscriminate use of 1080 and other poisons applied by helicopters must stop immediately as it is having a serious detrimental effect on our native flora and fauna. Paying a realistic bounty on rats, possums and stoats will materially speed up the achievement of the vision.

q6:

q7:

q8: No

q9: They are ok

q10: Introduction of a realistic bounty scheme on rats, stoats and possums. Aerial applications of any poisons must be removed.

q11: aboutright

q11comments:

q12: No

q13: Ruru and Karearea must be top of the list. They help to keep rats and mice in check as they live on these pests.

q14: No

q15: No

**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 5:48 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Name:** [REDACTED]  
**Organisation:**

**Email:** [REDACTED]

q1: No, if anything it will threaten ALL species even further due to the total disregard to risk.

q2: Why not try to change your binary thinking about us vs them? stop this war-mongering language it is immature, archaic and quite honestly, boring. Time to change the thinking to a more compassionate approach that stops the use of poisons and accepts that ecology will always be changing and evolving in ways man cannot always foresee, nor change.

q3: No. All species should be valued and respected. Non-natives are arbitrarily defined in this country - without meaning or thought. Education is deliberately skewed in favour of poisoning and inhumane methods of killing. It is NOT benefitting NZ social inequalities and domestic violence rates - time for a re-think that promotes high expectations without negative stereotypes and indiscriminate death.

q4: What 'Job'? The job that the Government has defined for itself? The same 'job' that the pseudo-scientists are promoting to maintain the gravy-train of poison industry? It is NOT our vision to kill thousands of innocent animals inhumanely. And it is definitely NOT Government's job to poison its own citizens without any regard for their health or wellbeing. WHERE are the epidemiological studies? Where are the submissions to the Rotterdam Convention? Where is the pre-and post operation assessments? Where is the fantasy rates of TB in possum? This is FRAUD!

q5: STOP the poisoning of our land and water

q6: New Zealand is already the biggest user of pesticides and banned poisons that any other country in the OECD. It is also one of the most polluting countries due to its fossil-fuel use.

I think its time to STOP! Take stock. Look at what is happening overseas, look at the overseas evidence and start some changes NOW.

q7: Stop poisoning our environment is a worthy goal.

q8: No - you are far off where we should be in the 21st century. Change the thinking - start to be more compassionate and humane. Start to CARE genuinely about our Clean Green 100% Pure New Zealand as if it actually MEANS something to us.

q9: NO.

q10: Stop poisoning our land and water.

q11:

q11comments: Stop poisoning our environment

q12: No

q13: Human beings and their companion animals.

q14: NO. because the threatened species is a social construct - constructed by a Government with a conflict of interest - one that benefits from the gravy train of the profitable poisoning industry.

q15: STOP poisoning your citizens. Have some pride in your Country! Study the impact the aerial poisoning operations have made on humans - and LEARN!



**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 5:49 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
Organisation: Member Of The Public!  
Email: [REDACTED]

- q1: No!!
- q2: Stop Poisoning Everything And Consult The Real Experts!!
- q3: No!!
- q4: No!!
- q5: Yes!! Many!!
- q6: No!
  
- q7: Yes!
- q8: No!
- q9: No!
- q10: Many!
- q11: toofew
- q11comments: You Cannot Anything With Mass Poisons!
- q12: No!
- q13: Many Should Be Equal!!
  
- q14: No Chance!!
  
- q15: Many! Be They Will Be Ignored, As Are All Expert Comments!!

# New Zealand's Threatened Species Strategy: submissions for consultation

#174

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

[REDACTED]

Organisation name:  
(if on behalf of an organisation)

Moths and Butterflies of New Zealand Trust

Email:

[REDACTED]

Signature:

[REDACTED]

(we accept a typed signature if  
no electronic signature)



## Submission:

You can answer all or some of the questions.

### 1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

No.

*We support the submission of the Forest and Bird Protection Society, in particular with respect to our Lepidoptera species.*

*The Moths and Butterflies of New Zealand Trust's mission statement is To increase biodiversity within New Zealand so that our butterflies and moths, and their habitat, are enhanced and protected where possible to benefit present and future New Zealanders*

*The Parliamentary Commissioner for the Environment has frequently commented on the deplorable state of our environment.*

*The proposed vision needs to honour our international commitments of restoring viable populations of all our threatened and at risk species across their natural range and maintain their genetic biodiversity.*

- *All threatened and at risk species will be protected, not just 20% of them, and*
- *All threatened and at risk species that are conservation dependent will be under intensive management setting them on a path to recovery.*

*The Moths and Butterflies of New Zealand Trust is particularly concerned with our Lepidoptera and its habitat and we are shocked to see how few of our moths are included in the species to be protected – and no butterflies, when the endemic forest ringlet, only found in this country and also labelled as in “serious decline” has been left off the list.*

*The vision for Predator Free NZ by 2050 – is supported. This needs to be expanded to include other key introduced predators such as mice, ferrets, weasels and feral cats.*

### 2. Are there additional aspects that you think should be included in the vision?

*We support the submission of the Forest and Bird Protection Society, in particular with respect to our Lepidoptera species.*

*The vision should address:*

- *the need to halt the loss of habitats which support threatened species*
- *Increased emphasis on improving our knowledge of the threats to, and conservation status of, species.*

*The vision is focused on land based threatened species and actions to assist them, yet there are large numbers of sea birds threatened with extinction as well as dolphins, whales, sealions, marine fish and invertebrates.*

*The vision and actions of the Strategy need to incorporate an all-of-government approach to protecting threatened and at risk native species. The actions (or lack of action) of many government agencies have significant impacts on our threatened species. All government agencies should have a responsibility under the Strategy to ensure that their policies and actions support the restoration of threatened and at risk species.*

**3. Do you agree with the characterisation of the value and current state of our native species?**

*Yes, we agree with the value of our biodiversity.*

*The Trouble in Paradise section of the strategy needs to recognise the impact of the commercial harvest of threatened species and the continued clearance of habitats of threatened species for commercial development such as farming intensification, urban expansion and infrastructure such as motorways.*

*The state of our species section needs to be more specific so that it is clear that for example what percentage of our Lepidoptera are threatened, and what the trends are for each group of species.*

**4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

*Like the Forest and Bird Protection Society, we feel the Strategy needs to require that all critically threatened species that would benefit from detailed management plans also have dedicated recovery groups that oversee the production and implementation of those plans.*

*The Strategy places too much emphasis on the need to prioritise the work between threatened species. This emphasis appears to be driven by the lack of resources, rather than conservation need. All threatened and conservation dependent species need to be managed for protection and there needs to be flexibility to be able to work on species that may not have been prioritised, but where an opportunity or a necessity arises.*

*Captive management should only ever be a last resort tool, as the priority for threatened species must be conservation in situ.*

*While Fenced sanctuaries serve a useful purpose, they should not be prioritised over conservation of threatened species in situ.*

*As the Parliamentary Commissioner for the Environment’s recent report notes, translocations are expensive and risky and should be evaluated against the overall benefit of the species and against the benefit of using the same resources to control predators, or to provide other assistance in the in situ restoration of threatened species.*

*The development of native threatened plant and habitat protection legislation is supported.*

*Support the adoption of a comprehensive National Policy Statement on Indigenous Biodiversity under the RMA.*

*Support greater use of legislation, regulation and policies to ensure that human actions do not further threatened species.*

*Development of a National Policy Statement on indigenous biodiversity is supported provided it sets bottom lines for biodiversity protection on private land, that will achieve the vision and the goals needed to protect and enhance all our Threatened and At Risk native species and prevent others becoming threatened.*

## **5. Are there other tools we could use to help us achieve the vision?**

*The best possible tool is to ensure that the Department of Conservation is adequately funded to undertake all the steps necessary to restore all species at risk of extinction and to prevent others from becoming threatened.*

*The government needs to also adequately resource science to identify the threats and agents of decline and develop management prescriptions*

*Tools and resources are needed to ensure the monitoring and enforcement of existing legislation, policies and regulations at the central and regional and local government levels.*

*Utilise the Crown's tenure review process to secure high country threatened species habitats and ecosystems in Crown ownership and control.*

*Greater use of DOC's advocacy functions under resource management and other legislation to halt the decline of our biodiversity and enhance threatened species and their habitats.*

*Regulations are needed to require appropriate bycatch mitigation techniques, and transition to modern, low impact, fishing techniques.*

*The war on weeds needs to be expanded from just 13 of the 350 weeds known to be harmful to nature.*

## **6. Will the proposed goals help us achieve the vision and assess our progress?**

*We agree with the Forest and Bird Protection Society that the proposed goals need to be considerably more ambitious.*

*There are no goals to achieve enhancing all of our threatened and at risk species, or increasing knowledge about the many data deficient species so that no species are data deficient.*

*There is no goal setting out how progress will be assessed and publicly reported.*

*Goal 4 fails to set a target for assessing data deficient species*

**7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

The goals, especially where Lepidoptera is concerned, should be amended to include:

- *Enhance the populations of more than 50% of our threatened species so that they are on the road to recovery by 2025,*
- *Manage all threatened species requiring conservation intervention for protection so that no species should become more threatened*
- *All threatened and conservation dependent species should be actively managed for recovery by 2030.*
- *Reduce by kill of threatened species to ensure recovery to non threatened status*
- *Select 230 data deficient species every year so that by 2030 there are no data deficient species.*

**8. Have we identified the right strategic themes?**

The following additional themes should be included:

- Uniting all Government agencies in an “all of government” response to threatened and at risk species to ensure all native species thrive.
- Maintaining genetic diversity and creating resilience

**9. Do you agree with our top 10 actions? -**

*See the additions and amendments set out below.*

**10 Are there any other actions that should be included, and any actions that should be removed?**

*In addition to achieving the Predator Free 2025 goals and the Battle for our Birds response to maasting events,*

*Increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control.*

*Develop a portfolio of priority areas for sustained and effective predator control beyond public conservation lands.*

*Amend Action 7 to; Develop and publish a portfolio of priority areas for threatened species protection on private land.*

*Amend Action 8 to select 1000 rather than 500 of the 3000 data deficient species for assessment.*

*Amend Action 9 to ensure that national recovery planning systems are not only fit for purpose but are also timely and implemented to achieve threatened species goals.*

*Add to Action 10 the development of a system for monitoring and regular public reporting on progress towards the goals.*

*Introduce regulations to achieve zero bycatch of threatened species in fisheries.*

*Expand the War on Weeds to include lupins, broom and willow on river beds and their margins*

*Add an action to identify and take opportunities to preferably purchase, or covenant habitats of threatened species.*

#### **11. Have we identified the right number of priority species?**

(Circle or highlight one)      • Too many      • About right

• Too few

#### **Comments:**

*The number of threatened species identified needs to be driven by what is actually required to safeguard our threatened species and ensure that their populations are resilient and thriving rather than fitting the prioritisation to the current lack funding.*

#### **12. Have we identified the right priority species? No**

*All the threatened species and those that are at risk and conservation dependent should be prioritised for enhancement by 2030*

*There is no justification for the list of priority species and no clear basis for disputing the choices.*

*We note that one flightless moth species (Kiwaia 'Cloudy Bay') which has been included is unnamed, and there is a second unnamed flightless species in this genus which is also a threatened species. There should be more funding made available to prioritise the taxonomy of these species.*

**13. Do you think other species should be prioritised ahead of the ones listed?  
And why?**

*Prioritisation should be dependent upon threat status, with account taken of the imminence of threats and be less influenced by the cost of management.*

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

*The overall framework is seriously lacking in ambition.*

*The vision, and consequent framework only proposes to increase the populations of 150 out of 800 threatened species at risk of extinction, and manage 600 out of a further 2,200 species at risk of decline. The vast majority of threatened and at risk populations which need help now are not covered by the Strategy's proposals for action.*

*The strategy relies heavily on Predator Free NZ, Battle for our Birds and the limited War on Weeds.*

*It fails to commit all government agencies to do their bit to meet the strategy's goals, especially for marine species, or commit the government to ensure that all of the public conservation lands needing predator control are under regular sustained predator control, and that there are effective policies and actions to protect threatened species on private land.*



**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 7:30 p.m.  
**To:** threatenedspeciesstrategy  
**Cc:** Norm Kelly  
**Subject:** [REDACTED]

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Please use this version of my submission  
Thank you. NZ's biodiversity is in crisis- tourism is not!  
DOC is supposed to foster recreation but only "allow" tourism, where it doesn't undermine conservation values.  
DOC also needs to ensure that overseas tourists are charged a higher level of fees for their use of public land/  
conservation estate recreational facilities than NZ citizens and residents.

Submission to: Department of Conservation

In response to: DOC's "Threatened Species Strategy"

---

**Submitter details:**

Name of submitter : [REDACTED]

Email: [REDACTED]

Signature: [REDACTED]

*(we accept a typed signature if  
no electronic signature)*

**Submission:**

**You can answer all or some of the questions.**

**1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?**

*No – This vision lacks ambition when it comes to protecting our precious, unique threatened and at risk native species. We are also concerned that the National Party is pushing for the use of transgenics/ genetic engineering on our public land/ conservation estate (this is unacceptable due to the serious ecological risks) .Thd proposed Threatened Species Strategy needs to honour New Zealand’s international commitments;*

*To restore viable populations of all our threatened and at risk species across their natural range and maintain their genetic biodiversity (this should include our rare endemic marine mammal species, Maui’s dolphins- the National Party led government has ignored the key recommendations of the International Whaling Commission for too long).*

*A stronger, more appropriate "vision" could be encapsulated by a vision based on that recommended by the Parliamentary Commissioner for the Environment’s recent Report on the state of our native birds.*

*“The restoration of abundant, resilient and diverse species and habitats across their natural range.”*

*To achieve this, the Strategy’s vision needs to be much more ambitious than just aiming to safeguard 20% of our threatened species by 2030. Like Predator Free New Zealand it needs to aim high and look to safeguard all our threatened species by setting clear goals for significant increases in the number of threatened species that will be actively managed for their restoration; i.e.:*

- ***All** threatened and at risk species will be protected, not just 20% of them, and*
- ***All** threatened and at risk species that are conservation dependent will be under intensive management setting them on a path to recovery.*

*The vision for Predator Free NZ by 2050 – is supported, but without the use of transgenics/ genetic engineering (GMOs) on our public land/ conservation estate (due to the serious risks and potential for irreversible harm/ unintended, unforeseen adverse impacts on indigenous flora and fauna, as well as existing valuable GE Free Zones in NZ).. The vision needs to be expanded to include the other key introduced predators, especially mice, ferrets, weasels and feral cats.*

*“Battle for our Birds” is supported but needs to be expanded so that all of the public conservation land needing predator control is under regular sustained predator control. This would only cost around \$50 million a year (based on roughly 7million ha receiving control once every 3 years with an average cost of \$7 per ha).*

*Until we have eradicated all introduced predators we need to make sure that our threatened species survive and no more species become threatened. To do this we will also need comprehensive, landscape – scale, predator control on land outside of the conservation estate.*

*The “War on Weeds” also needs to be expanded from the dirty dozen as this is less than 4% of the 350 weeds which currently threaten nature. Weeds such as lupin, broom, poplar and gorse are urgently in need of control in some habitats where there are many threatened species such as braided river beds and lowland dryland sites.*

## **2. Are there additional aspects that you think should be included in the vision?**

*The vision should address:*

- *the need to halt the loss of habitats that support threatened species. DOC needs to start opposing appalling proposals like the recent Stevenson Mining Ltd application for a new open cast mine above the Buller river/ Westport which would destroy mature beautiful rimu forest and Kiwi habitat.*
- *Increased emphasis on improving our knowledge of the threats to, and conservation status of, species.*
- *Actions for threatened marine species like Maui's dolphins in particular (and for NZ to honour its international obligations and act on the recommendations of the International Whaling Commission)*

*The vision is focused on land based threatened species and actions to assist them, yet there are large numbers of sea birds threatened with extinction as well as dolphins (including Maui's and Hector's dolphins), whales, sealions, marine fish and invertebrates.*

*The vision and actions of the Strategy need to incorporate an all-of-government approach to protecting threatened and at risk native species. The actions (or lack of action) of many government agencies have significant impacts on our threatened species. All government agencies should have a responsibility under the Strategy to ensure that their policies and actions support the restoration of threatened and at risk species.*

## **3. Do you agree with the characterisation of the value and current state of our native species?**

*Yes Agree with the value of our biodiversity.*

*The Trouble in Paradise section of the strategy needs to recognise the impact of the commercial harvest of threatened species, such as whitebait species and Long finned eels, and the continued clearance of habitats of threatened species for commercial development such as farming intensification, urban expansion and infrastructure such as motorways.*

*The state of our species section needs to be more specific so that it is clear that for example what percentage of our birds, or reptiles, are threatened, and what the trends are for each group of species.*

**4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

*The Strategy needs to require that all critically threatened species that would benefit from detailed management plans also have dedicated recovery groups that oversee the production and implementation of those plans.*

*The Strategy places too much emphasis on the need to prioritise the work between threatened species. This emphasis appears to be driven by the lack of resources, rather than conservation need. All threatened and conservation dependent species need to be managed for protection and there needs to be flexibility to be able to work on species that may not have been prioritised, but where an opportunity or a necessity arises.*

*Captive management should only ever be a last resort tool, as the priority for threatened species must be conservation in situ.*

*While Fenced sanctuaries serve a useful purpose, they should not be prioritised over conservation of threatened species in situ.*

*As the Parliamentary Commissioner for the Environment’s recent report notes, translocations are expensive and risky and should be evaluated against the overall benefit of the species and against the benefit of using the same resources to control predators, or to provide other assistance in the in situ restoration of threatened species.*

*The development of native threatened plant and habitat protection legislation is supported..*

*Support the adoption of a comprehensive National Policy Statement on Indigenous Biodiversity under the RMA.*

*Support greater use of legislation, regulation and policies to ensure that human actions do not further threaten species, for example zero bycatch of threatened species in the fishing industry, no clearance of threatened species habitats.*

*Development of a National Policy Statement on indigenous biodiversity is supported provided it sets bottom lines for biodiversity protection on private land, that will achieve the vision and the goals needed to protect and enhance all our Threatened and At Risk native species and prevent others becoming threatened.*

## **5. Are there other tools we could use to help us achieve the vision?**

*The best possible tool is to ensure that the Department of Conservation is adequately funded to undertake all the steps necessary to restore all species at risk of extinction and to prevent others from becoming threatened.*

*The government needs to also adequately resource robust science to identify the threats and agents of decline and develop management prescriptions (but not genetic engineering/ use of GMOs, transgenics, as the risk to the environment and sustainable primary production and our biosecurity is too great).*

*Tools and resources are needed to ensure the monitoring and enforcement of existing legislation, policies and regulations at the central and regional and local government levels.*

*Utilise the Crown's tenure review process to secure high country threatened species habitats and ecosystems in Crown ownership and control.*

*Greater use of DOC's advocacy functions under resource management and other legislation to halt the decline of our biodiversity and enhance threatened species and their habitats.*

*Regulations are needed to require appropriate bycatch mitigation techniques, and transition to modern, low impact, fishing techniques.*

*The war on weeds needs to be expanded from just 13 of the 350 weeds known to be harmful to nature.*

## **6. Will the proposed goals help us achieve the vision and assess our progress?**

*The proposed goals need to be considerably stronger/ more ambitious.*

*There are no goals to achieve enhancing all of our threatened and at risk species, or increasing knowledge about the many data deficient species so that no species are data deficient.*

*There is no goal setting out how progress will be assessed and publicly reported.*

*Goal 4 fails to set a target for assessing data deficient species*

## **7. Are there alternative goals that you think will better achieve the vision and assess our progress?**

Amend the goals to include:

- *Enhance the populations of more than 50% of our threatened species so that they are on the road to recovery by 2025,*
- *Manage all threatened species requiring conservation intervention for protection so that no species should become more threatened*
- *All threatened and conservation dependent species should be actively managed for recovery by 2030.*
- *Reduce by kill of threatened species to ensure recovery to non threatened status. Do not use aerial 1080 in conservation areas with critically threatened species like rock wren, as DOC is responsible for killing (at Kahurangi National Park) 50% of the rock wren species- this is unacceptable.*

- *Select 230 data deficient species every year so that by 2030 there are no data deficient species.*

*-support ground based control (no aerial 1080) in front country areas where local communities or mana whenua want to undertake comprehensive ground based control*

## **8. Have we identified the right strategic themes?**

The following additional themes should be included:

- *Uniting all Government Agencies in an “all of government” response to threatened and at risk species to ensure all native species thrive.*
  - *Maintaining genetic diversity and creating resilience*
- more emphasis on protection of critically endangered species like Maui's dolphins*

## **9. Do you agree with our top 10 actions? -**

*Yes with additions and amendments, as set out below.*

## **10 Are there any other actions that should be included, and any actions that should be removed?**

*In addition to achieving the Predator Free 2025 goals and the Battle for our Birds response to maasting events,*

*Increase landscape scale predator control so that all of the public conservation lands needing predator control are under regular sustained predator control.*

*Develop a portfolio of priority areas for sustained and effective predator control beyond public conservation lands.*

*Amend Action 7 to; Develop and publish a portfolio of priority areas for threatened species protection on private land.*

*Amend Action 8 to select 1000 rather than 500 of the 3000 data deficient species for assessment.*

*Amend Action 9 to ensure that national recovery planning systems are not only fit for purpose but are also timely and implemented to achieve threatened species goals.*

*Add to Action 10 the development of a system for monitoring and regular public reporting on progress towards the goals.*

*Introduce regulations to achieve zero bycatch of threatened species in fisheries.*

*Expand the War on Weeds to include lupins, broom and willow on river beds and their margins*

*Add an action to identify and take opportunities to preferably purchase, or covenant habitats of threatened species.*

**11. Have we identified the right number of priority species?**

(Circle or highlight one) NO- • Too few

**Comments:**

*The number of threatened species identified needs to be driven by what is actually required to safe guard our threatened species and ensure that their populations are resilient and thriving rather than fitting the prioritisation to the current lack funding.*

**12. Have we identified the right priority species? No**

*All the threatened species and those that are at risk and conservation dependent should be prioritised for enhancement by 2030*

**13. Do you think other species should be prioritised ahead of the ones listed? And why?**



*Prioritisation should be dependent upon threat status, with account taken of the imminence of threats and be less influenced by the cost of management.*

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

*The overall framework is seriously lacking in ambition.*

*The vision, and consequent framework only proposes to increase the populations of 150 out of 800 threatened species at risk of extinction, and manage 600 out of a further 2,200 species at risk of decline. The vast majority of threatened and at risk populations which need help now are not covered by the Strategy's proposals for action.*

*The strategy focuses on terrestrial species, relying heavily on Predator Free NZ, Battle for our Birds and the limited War on weeds. There is a disappointing lack of focus on out shore and seabirds which are also facing significant threats or marine and freshwater species generally.*

*It fails to commit all government agencies to do their bit to meet the strategy's goals, especially for marine species, or commit the government to ensure that all of the public conservation lands needing predator control are under regular sustained predator control, and that there are effective policies and actions to protect threatened species on private land.*

*I also have grave concerns that DOC is spending way too much of its budget on subsidising tourism (especially tacky commercial tourism proposals and supporting tourism proposals on our public lands-like cycleways- that undermine rather than support conservation values). See "Concessions failing conservation" 29 July 2017 THE PRESS See the findings of of new research by Victoria University. Doc is spending roughly one third of its annual budget subsidising tourism but receiving little in return. DOC also needs to prioritize less expensive basic recreational facilities for Kiwis and their families, rather than flash, tacky commercial ventures on our public lands. For example, the appalling commercial proposal for the Oparara basin/caves which would undermine conservation values. another example is the "Old Ghost Road" which has caused significant environmental harm and never should have been allowed on our public conservation land in the Mokihinui Ecological Area. DOC also failed to monitor and prosecute individuals in the Mokihinui Lyell Backcountry Trust who cut down (for no good reason) a noble, 50 metre tall (in good health) Kahikatea tree at Mokihinui forks.*

*"Great Walk" users who are from overseas should pay higher fees than New Zealanders and their families, so DOC can recoup the money it invests in the Great Walks and put a larger portion of it back into conservation. I also support a "green" entry tax or "Nature levy" at the border into. There should be a significant additional charge tax for overseas visitors entering this country, 2/3 of such funds generated should go to conservation/ protection of indigenous flora and fauna (only 1/3 going to tourism). NZ citizens and residents should be excluded from this "entry" charge back into NZ when they travel overseas to acknowledge their contribution as taxpayers and volunteers.*

See

[www.stuff.co.nz/environment/95152815/tourism-concessions-failing-to-deliver-conservation-advantages-study-suggests](http://www.stuff.co.nz/environment/95152815/tourism-concessions-failing-to-deliver-conservation-advantages-study-suggests)

NZ's Biodiversity is in crisis- tourism is not!

*I wish to be heard. Please keep me informed.*

**From:** [redacted]  
**Sent:** Monday, 31 July 2017 8:09 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** submission

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420  
Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

**Submissions must be received no later than 5 pm Monday 31 July 2017**

Anyone may make a submission, either as an individual or on behalf of an organisation.

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### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
*(if on behalf of an organisation)*

Email:

Signature:

*(we accept a typed signature if  
no electronic signature)*

**Submission:**

**You can answer all or some of the questions.**

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

yes

2: Are there additional aspects that you think should be included in the vision?

No

3: Do you agree with the characterisation of the value and current state of our native species?

yes

4: Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?

*We suggest using some new regulations*

- *to protect long-fin eels – chosen on your list for protection. Prohibit eel fishing in upland waters where it likely to catch long-fin eels OR stipulate that all long-fin eels captured should be released. It is wrong and ridiculous to allow catching and killing of endangered species.*
- *Address harvest of whitebait fishing. There is public acceptance that whitebait stocks are dwindling. Whitebait includes many species of juvenile freshwater fishes, including giant kokopu (listed for protection). Prohibit commercial fishing of whitebait and limit the amateur season. Whitebait fishing is a valued recreation but seasons could be shortened or altered to exclude times when particularly vulnerable species are likely to be caught, and give all whitebait a better chance of survival.*
- *Dogs are introduced predators and inappropriate on DOC land. Prohibit them unless permitted for a specific reason. This would be unpopular with pig hunters but would be welcomed by other users of DOC land*

5: Are there other tools we could use to help us achieve the vision?

6: Will the proposed goals help us achieve the vision and assess our progress?

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

8: Have we identified the right strategic themes?

9: Do you agree with our top 10 actions?

Yes

10: Are there any other actions that should be included, and any actions that should be removed?

11: Have we identified the right number of priority species?  
(Circle or highlight one) • Too many • About right • Too few

**Comments:**

12: Have we identified the right priority species?

13: Do you think other species should be prioritised ahead of the ones listed? And why?

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

15: Do you have any further comments regarding the draft Strategy that is not covered above?

**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 9:58 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

Name: [REDACTED]  
Organisation:  
Email: [REDACTED]

q1: No - I don't believe it is ambitious enough. I would like to see more threatened species actively managed to ensure they are adequately protected. It feels to me that this strategy is a way of maximising the benefit of existing conservation programmes e.g Battle for our Birds, without calling on the Government for much-needed extra funding for the urgent task of saving our threatened species. It is pragmatic rather than ambitious, but I applaud the Department for taking the first small step and acknowledging that we have hundreds of threatened species that require urgent help.

q2: All of the existing conservation programmes that this strategy is reliant on are good as far as they go, but most of them don't go far enough e.g War on Weeds needs a broader mandate for other ecologically important weed species, Predator-Free 2050 needs to include mice, ferrets, weasels and feral cats. I would like to see more marine and coastal species included in the plan, and better management to prevent further habitat loss.

q3: Yes I agree with you that our endemic biodiversity needs better protecting, to prevent extinctions.

q4: Lots of the tools identified seem to involve institutions such as zoos and Botanic Gardens, and focus on collecting seeds or moving species to a fenced sanctuary, for example, rather than focus on keeping species in their original habitat as part of a functioning ecosystem. These tools are alright, but I think we should put more effort into keeping species in their native wild habitat.

q5: More use of species recovery plans and groups that are expert in particular taxa.

q6: I think the goals are rather modest - we should be aiming to protect and enhance many more species than the plan currently suggests.

q7:

q8:

q9:

q10:

q11: too few

q11comments:

q12:

q13:

q14:

q15: I fully support and endorse Forest and Bird's well considered submission.

**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 10:08 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]

Organisation:

Email: [REDACTED]

q1: No, it is not sufficiently ambitious

q2: More emphasis on reduction of habitat loss

q3: Yes

q4:

q5: Increased DOC funding

q6: Goal 3 is fuzzy

q7:

q8:

q9:

q10: Cats are mentioned twice in the draft document (because controlling them is contentious in some circles?).

More emphasis on control of feral cats please.

q11: toofew

q11comments:

q12:

q13:

q14:

q15:

**From:** [REDACTED]  
**Sent:** Monday, 31 July 2017 11:28 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** Draft Threatened Species Strategy

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Name: [REDACTED]  
Organisation: GE Free (N.Z.) Northland Inc.  
Email: [REDACTED]

q1: As the vision is cloud-thinking it is obviously too early to comment until there is more detail and a picture of how it looks "on the ground"

Good feeling so far but give us the details and methods that are intended to be used

q2: As above - too early to comment

q3: As above

q4: The devil will be in the detail. What EXACTLY are the right tools

q5: Feet on the ground.

q6: Some will obviously help but each method must be thought through including the downsides to see which methods are best suited and give the best long-term result

q7: As above

q8: As above

q9: As above

q10: Give the details before decision time so measured responses can be given

q11:

q11comments:

q12:

q13:

q14: It is a start but should not be closed to continual review

q15:



**Laura Mansfield**

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**From:** Norm Kelly  
**Sent:** Thursday, 19 October 2017 3:47 p.m.  
**To:** threatenedspeciesstrategy  
**Subject:** FW: GE Free Northland corrected submission DOC draft Threatened Species Strategy

**From:** Kerikeri Organic [mailto:organics@value.net.nz]  
**Sent:** Monday, 28 August 2017 10:58 p.m.  
**To:** threatenedspeciesstrategy <threatenedspeciesstrategy@doc.govt.nz>; Norm Kelly <nokelly@doc.govt.nz>  
**Subject:** GE Free Northland corrected submission DOC draft Threatened Species Strategy

att: Department of Conservation

Tena koe

Our community group mistakenly didn't get in our full submission (a partial submission was made online, without our contact details).

Please find our full submission below.

We hope that you will consider this when deliberating on the other submissions received by DOC in response to the DOC draft "Threatened Species Strategy"

Thank you for the opportunity to submit. Please keep us informed as to the result of your public consultation.

When will the feedback/ submissions lodged be publicly available?

Thank you.

Nga mihi

[Redacted signature]

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Thank you for the opportunity to make a submission, so that together we can achieve sound environmental outcomes.

While we support well funded, wide spread protection of our native species (including native birds) using safe and practical methods, our community group strongly opposes the outdoor use of GE/GMOs or "gene drive" on our public conservation lands, due to the serious risks to our biosecurity, indigenous biodiversity, wider environment, existing non GM primary producers, economy and the public health.

We are concerned about Minister of Conservation's comments in the Northern Advocate about using "biochemical warfare" on our public lands

[www.nzherald.co.nz/northern-advocate/news/article.cfm?c\\_id=1503450&objectid=11907803](http://www.nzherald.co.nz/northern-advocate/news/article.cfm?c_id=1503450&objectid=11907803)

( she acknowledges that " we don't have the social licence for that".

We oppose any work involving genetic modification of New Zealand's native flora and fauna.[However, ethical laboratory research into the effects of GM organisms on the natural environment is supported in the strict containment of the laboratory, but with great caution and with the application of the precautionary approach to all issues.

The precautionary and prohibitive GE/GMO policies of local councils in Northland, Auckland, Bay of Plenty, Hawke's Bay and Nelson must be respected and adhered to. Use of sterility genes/ techniques is highly risky, despite claims that this could be a "magic silver bullet" to kill feral pests. In the case of possums, this could result in the extinction of possums in Australia (where they are indigenous). Genes can jump species.

"Where proponents of gene drive engineering argue its lethal effect is specific to the target species because (with rare, unsuccessful exceptions) species do not mate with each other, the USNAS says the risks of unintended consequences must be considered, "especially in regard to the risk of transfer to non-target species".

The science on the outcomes of releasing gene-drive engineered males into the environment does not yet know enough about what those outcomes will be.

Only when some of these are identified, and a probability estimated, will we be able to speak of risks.

As things stand too many outcomes are simply unknown.

In a country with a long history of discovering too late the unintended consequences of ecological engineering — rabbits, possums, stoats — some caution is surely justified.

For New Zealand, this could end up accepting the risks of complete predator removal through gene drive engineering are just too high."

-Colin Campbell-Hunt, chairman of Otago Natural History Trust, Orokonui Ecosanctuary

Please find below the Forest & Bird precautionary GE/GMO policy and a link to the full article from the Otago Daily Times, detailing concerns of an experienced, committed conservationist about proposed use of gene drive in NZ (Colin Campbell-Hunt, chairman of Otago Natural History Trust, Orokonui Ecosanctuary).

"Risks may accompany gene technology" 17 October 2016 Otago Daily Times

Many of our members are involved in "hands on" work (on private and public land) to protect are native birds and are very concerned that the National Party led government has slashed DOC's core biodiversity budget and now pushing for risky outdoor use of GE/GMOs

It's not only on land that the National Party has failed to adequately fund safe biodiversity work/ feral pest control. National failed to act on the recommendations of the International Whaling Commission (IWC), to help save our endemic, rare marine mammal species Maui's dolphins (who live only between Maunganui Bluff and the Taranaki coast).

In 2014 the National Party tried to open up for oil exploration and drilling more than 3000 square kilometres of a Marine Mammal Sanctuary - home to the critically endangered Maui's dolphin. An ethical government would do more about our gorgeous wee dolphins (Maui's and Hector's), stop them drowning in set nets and other unnecessary deaths, ban sea bed mining, oil exploration and drilling in their rohe and help fishermen transition into better practices.

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## Genetic Engineering Policy

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*(Approved by the Forest and Bird Society's Council Meeting June 2002)*

1. That the Society adopt a precautionary approach to genetic engineering, adopting the precautionary principle (see definition below).
2. That the Society advocate to Government for a GMO-free conservation estate. [This is in line with clause 2(a) of the F&B Constitution - "...to take all reasonable steps...for the preservation and protection of the indigenous flora and fauna..."]
3. That the Society support research into a wide range of methods of pest control, including the laboratory use of GE techniques or genetically modified organisms (GMOs). [Such research should endeavour to satisfy our concerns as expressed in the precautionary approach, or possible effects on native wildlife. Each case of use of GMOs and associated risks will be considered on a case-by-case basis.]
4. That the Society oppose any work involving genetic modification of New Zealand's native flora and fauna.[However, laboratory research into the effects of GM organisms on the natural environment is supported, but with great caution and with the application of the precautionary approach to all issues.]

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## Genetic Engineering Policy

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*(Approved by the Forest and Bird Society's Council Meeting June 2003)*

That this Council Meeting of the Royal Forest and Bird Protection Society requests the Government that all genetically modified organisms be kept in secure containment through an extension of the moratorium, until such time as rigorous testing, on a case-by-case basis, has proved that the genetically modified organism about to be put up for conditional or general release, will not adversely affect any of the indigenous ecosystems of New Zealand.



Orokonui Ecosanctuary  
PO Box 101, Bell Bay, Dunedin 9081  
Tel: 03 479 1755  
info@orokonui.org.nz  
www.orokonui.org.nz

## Submission on Draft Threatened Species Strategy

The Otago Natural History Trust is the governing body for the Orokonui Ecosanctuary outside Dunedin. Orokonui is one of a group of large fenced sanctuaries that have led the move to bring threatened native species back to the mainland. These projects have been created and sustained through the enthusiasm of local communities. In the process we believe we have learned a great deal about how to engage local communities in the fight to make New Zealand safe – or safer – for the country's taonga.

Our submission on the Draft Threatened Species Strategy is that the aspirations of the strategy cannot be achieved without the large-scale commitment of resources (both financial and volunteer time) of the community. The Draft Strategy must be revised to give a much more prominent role to engagement with local communities – including the many predator-control and fenced sanctuaries already in operation on the mainland. Further development of operational plans to advance the strategy must be done in collaboration with community groups. They cannot be told what to do, they must be full partners in the planning and execution of projects which will have to be sustained for many decades – in fact indefinitely.

We suggest that anyone with experience in conservation in New Zealand knows that the forces of central government – for all of DOC's heroic efforts over many years - will be inadequate to the task of reversing the steady decline in all of our native species. The funding will be inadequate, even when leveraged with that of benefactors. We also believe that the many committed conservationists in the Department and elsewhere have no greater motivation but to "save our birds" (and other threatened species). But until they know that these ambitions have realistic chance of success, the Threatened Species Strategy will be nothing more than a hollow rallying cry that will fail to mobilise the armies of people who are indispensable to making the strategy work.

The following paragraphs set out the contribution that community-led sanctuaries like Orokonui must play in making the mainland safe again for our country's threatened species. We, and all of the community projects across the country, are only waiting to be asked to play our part in the great effort. Please do not ignore us – not for our sake, or yours, but for the birds.

### Ongoing need for conservation management on the mainland

The 2016 report on the Conservation Status of New Zealand Birds concluded that improvements in the conservation status of birds since the 2012 report were “mainly due to successful conservation management”. An example is the strong improvement in the number of species classified as “AT Risk – Recovering” which has risen from 9 in 2008 to 23 in 2016 – 15 of these recoveries being Conservation Dependant. For species not subject to management, the typical experience is a continuing decline of between 1-2% per year.

A study of bird counts across 195 sites in the North Island gives further precision to this conclusion, finding that the effects of complete eradication on bird abundance, as achieved in fenced sanctuaries, were “far larger than the effects of other pest control categories”. (Ruffell and Didham, New Zealand Journal of Ecology 2017, **41(1)**, 23-33.)

Another analysis in the same volume (Parkes and others, pp 151-161) compares two strategies for pest control: one based on a network of defensible sites in which pests are controlled to low densities [e.g. fenced sanctuaries] and linked together in corridors of lower control intensity; and the second aiming to eradicate a limited number of predators across the entire landscape (the Predator Free New Zealand strategy). With current technology the second of these is assessed to require \$32 billion. The analysis concludes that “the core/halo model of pest management ... will best protect New Zealand’s biodiversity for the foreseeable future. The national scale pest- or predator-free aspiration is not currently (and may never be) feasible and risks diverting resources from more optimal solutions”.

The same conclusion is reached in a Lincoln University study of the cost to make Banks Peninsula predator free. This is estimated to require at least the entire \$84 million budget being proposed by Predator Free New Zealand for the entire country.

### Vital need to engage the enthusiasm and commitment of local communities

The above studies make it very clear that we cannot buy our way to biodiversity restoration on the mainland. Our experience at Orokonui strongly endorses the conclusions of the Lincoln study on Banks Peninsula:

- adopt a feasible target - not eradication but control to low levels
- invest in improved, low-labour-intensity trapping technologies
- sustain investment in the strategies that are controlling predators now [and fenced sanctuaries are pre-eminent in this regard]
- nothing sustainable will be achieved without a huge volunteer army that will sustain its commitment in perpetuity
- never take volunteers for granted because they will abandon strategies they don’t believe in

We agree completely with the Banks Peninsula study’s conclusion: "The volunteer army on the ground is what's currently keeping our native species alive".

### National strategies that ignore community-led restoration will fail

Given the financial impossibility of buying our way to meet our biodiversity aspirations at a national scale, and the consequent pre-requisite of engaging local communities, any strategy that fails to engage with and support community-led and community-resourced projects will fail.

We are therefore concerned to see the Threatened Species Strategy cite as the foundations on which it intends to build only national-level initiatives: Predator-Free New Zealand, National Science Challenges, War on Weeds, Battle for our Birds, Save our Iconic Kiwi, and Freshwater Reforms. No profile is given to community-led projects as crucial partners in the strategy. Fenced sanctuaries are recognised for their provision of safe habitat, but there is no recognition of the ability of these projects to mobilise the volunteer armies without which biodiversity restoration on the mainland will not succeed, nor their crucial role as sources for migration of species to landscape scale. There is no recognition of the 600+ community-based environmental groups identified in a 2015 PhD thesis by Monica Peters that are exemplars of the community commitments that will be required to return our native species at landscape scale, nor has there been an attempt to win their support by involving them in the creation of the strategy.

### The contribution of fenced sanctuaries like Orokonui

If there is an example anywhere of the kind of community-led conservation initiative that will be vital in returning native biodiversity to landscape scale, it is Orokonui.

We celebrate what has been achieved over the last 10 years:

- An integrated suite of strategies that: contribute to conservation; build the community's commitment to conservation through advocacy; attract and train volunteers; build revenues from tourists; and educate the next generations who will have to sustain restoration efforts in perpetuity.
- These achievements contrast with the diverse, limited and poorly integrated strategies being developed at national and regional levels. To quote from Parks again "The current deployment [of pest-management strategies] is the sum of largely independent decisions made by different agencies and individuals with different priorities. ... overall deployment will always be suboptimal when objectives are set at regional or local scales". Orokonui is indeed operating at local scale but it is also an exemplar at a small scale of the integrated strategies that will be required to restore and maintain native biodiversity at the national level.
- In particular, it has achieved everything through the active involvement of the local community, multiplying DOC's past funding to the sanctuary 9-fold.
- As landscape scale restoration develops, Orokonui will be one of several secure sites from which native taxa will migrate beyond the fence
- Above all, Orokonui has built an army of volunteers that contributes 13,000 hours a year to the sanctuary's programmes (the equivalent of 7 full-time employees).

- If there is one strategy that has a proven record of motivating and marshalling the volunteer armies needed to restore biodiversity to the mainland it is sanctuaries like Orokonui.

#### The need for leadership

We believe that our concerns for the future of biodiversity restoration to the mainland are justified and well founded. We believe that sanctuaries like Orokonui, and community-led conservation efforts of all kinds, will play an indispensable role in making New Zealand safe again for our vanishing biological heritage.

We urge that the final form of the Threatened Species Strategy not only widens its scope to include community groups like ours, but immediately involve a group such as Sanctuaries of New Zealand Inc. in further development of the strategy, and continue to develop relationships of real partnership and trust with communities, and so give us a stake in a future that can only be reached with our help.

For the Otago Natural History Trust



Chair





**ENVIRONMENT AND CONSERVATION ORGANISATIONS OF NZ INC.**

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Environment and Conservation

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**Environment and Conservation Organisations of NZ Inc's Submission to the New Zealand's Threatened Species Strategy**

Environment and Conservation Organisations of NZ Inc (ECO) is the national alliance of organisations for the environment and conservation. Some of these organisations are federations or multiple groups. Not all are conservation or

environmental organisations. We have been active in conservation and environmental management and practice, law and policy since 1971-2 and we have member groups from all around New Zealand. We have an Environmental management and Law Working Group and a Biodiversity and Biosecurity Working Group. This submission was prepared by the following organisations:

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- ) that we are losing species in the non-threatened area.
- ) The strategy is unclear how it fits with the wider Aichi targets;
- ) Clear advocacy by the Department which is not trumped by development agencies in a whole of Government approach.

It is unclear the status of the ***New Zealand Biodiversity Action Plan 2016–2020*** as it has not been developed and consulted on as a “participatory” plan as required by Aichi Target 17.

There are differences between the “Action Plan” and this strategy.

## **International Obligations**

Internationally there has been a recognition of the need to protect biodiversity which is wider than that covered by the Convention on Biodiversity.

The protection of unique and rare species is acknowledged in the UN Convention on the Law of the Sea (UNCLOS) art 194.5 which provides that:

*“5. The measures taken in accordance with this Part shall include those necessary to protect and preserve rare or fragile ecosystems as well as the habitat of depleted, threatened or endangered species and other forms of marine life.”*

There is currently no provision to allow protection and preservation of fragile or threatened species in the marine environment.

## **Aichi Targets:**

The Convention on Biodiversity

Aichi Target 12 of the *Strategic Plan for Biodiversity 2011–2020* states:

*“By 2020 the extinction of known threatened species has been prevented and their conservation status, particularly of those most in decline, has been improved and sustained”;*

Target 12 in the ***New Zealand Biodiversity Action Plan 2016–2020*** is a mangled version of this Aichi target.

As IUCN commented:

*Aichi Biodiversity Target 12 calls for the establishment of conservation plans for species that are most threatened with extinction. Thus, a primary step to achieve Aichi Target 12 is to understand the extinction risk posed to species through making conservation assessments of targeted species.*

*The achievement of Target 12 is linked to progress towards many of the other Aichi Targets. Species threat assessments form the baseline of biodiversity data to inform decision making,*

*for example for the identification of sites for Protected Areas (Target 11), ensuring no species is threatened through trade (Targets 4 and 6) and for the control and eradication of alien invasive species (Target 9).*

*The contribution of the IUCN Species Programme's to Target 12 is through the maintenance and management of The IUCN Red List of Threatened Species™ knowledge product (including the species assessments and all associated guidance, documentation, standards and criteria for species assessments, and technical and policy advice).*

[<https://www.iucn.org/theme/species/our-work/influencing-policy/convention-biological-diversity-cbd/aichi-targets>]

## **IUCN Goals**

ECO notes that IUCN has agreed to many Recommendations in the last two General Assemblies on threatened species.

In 2012 the IUCN World Conservation Congress adopted a measure - WCC-2012-Res-014-EN - Implementing Aichi Target 12 of the Strategic Plan for Biodiversity 2011–2020.

This measure CALLS ON all countries to:

- a. identify globally and nationally threatened species during the development of their respective National Biodiversity Strategies and Action Plans (NBSAPs) and include strong provisions for their conservation and recovery addressing their threats and drivers;*
- b. support their NBSAPs through well-developed processes for preparing national Red Lists and for identification, appropriate protection and management of sites of global importance for biodiversity bearing in mind the new standard that IUCN is developing for identifying such sites, and building on existing networks of such sites already identified worldwide;*
- c. develop multi-stakeholder plans for the recovery of threatened species, drawing as needed from the guidelines Strategic Planning for Species Conservation developed by IUCN's SSC;*
- d. develop innovative approaches to preventing extinctions that provide benefits to local human communities and build support for conservation, including through sustainable use where relevant and appropriate;*
- e. ensure that all major development projects, such as the building of dams and the conversion of natural habitats, take the needs of threatened species fully into account, and are only implemented if they include measures to conserve threatened species, prevent extinctions and bring about species' recovery;*
- f. ensure that all programmes involving the harvesting of wild species, including in the fisheries and forestry sector, are managed so that the harvest levels are sustainable, including for non-target species, and where possible generate incentives for conservation;*  
*and*
- g. build the capacity of national nature conservation agencies to implement species recovery programmes;*

Other relevant resolutions include:

- ) WCC-2012-Res-015-EN - Saving the world's most threatened species;*

- )] WCC-2012-Res-016-EN - Framework for setting priorities for the conservation of threatened species
- )] WCC-2012-Res-017-EN - Enhancing the usefulness of the IUCN Red List of Threatened Species

On protected areas provisions of the Aichi targets there are several resolutions. In addition there are the recommendations from the World Parks Congress. This includes: "the report from Stream 1 of the 2014 IUCN World Parks Congress states that many delegates argued for protected area coverage of "around 30% of the planet for no-take reserves, 50% overall protection, and 100% of the land and water managed sustainably"

### **Flawed Legislative Mandate**

The Department of Conservation and the Minister of Conservation role in biodiversity conservation and the protection and restoration of threatened is undermined by archaic legislation and legislation which makes biodiversity conservation subservient to economic development agencies in the Fisheries Act, Wildlife Act, Marine Mammal Protection Act, Crown Minerals Act.

ECO considers that New Zealand needs to Introduce a Threatened Species and Habitats Act, modeled on NSW and Australian federal legislation and covering terrestrial, freshwater and marine biota. This would be designed to give the department a clear mandate to protect biodiversity in all its forms.

The advocacy which the Department needs to implement this strategy and the ***New Zealand Biodiversity Action Plan 2016–2020*** will not occur if it is subject to the ongoing whole of Government approach. This just means that economic agencies trump the Department of Conservation and the strategy provisions will be doomed to fail

### **Threatened species process and listings**

ECO notes that so far two marine species have been listed under the Marine Mammals Protection and no species have been listed under the provisions of the Wildlife Act or the **Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012**. This lack of action is in spite of there being well over 100 threatened marine species.

There are no adopted population management plans under the Wildlife Act or the Marine Mammal Protect Act to give legislative protection to species threatened by fishing. ECO acknowledges that the provisions are poorly written and difficult to enforce and should be a priority are for review.

There is currently no clear provisions to protect threatened freshwater species, equivalent to protected areas.

The New Zealand assessment of threatened species is different from the IUCN criteria and has not been used to assess threatened species which do not breed in New Zealand. This includes a number of threatened seabirds and other migratory species. Not all invertebrates have been assessed.

To give wider recognition to species that breed in New Zealand which also migrate out of our EEZ, all species should be categorized under NZ and IUCN criteria. This would improve the advocacy for threatened New Zealand species eg as set in the National Plan of Action on Seabirds<sup>1</sup> – this is set out as:

- vi) *active co-operation is established with other countries whose vessels have interactions with seabirds, particularly those that breed in New Zealand, including through relevant RFMOs and through bilateral information sharing and assistance where relevant.*

The strategy should also recognize the National Plan of Action on Sharks<sup>2</sup> which also includes action on threatened species.

The National Plans of Action should be recognized under Aichi Target 5 as well as Aichi Target 12.

## Questions raised

### 1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

#### **Response:**

No. Out of some 3000 threatened and at risk species, to aim to manage only 500 within the next 8 years, and only a further 100 over the next 5 after that is a very low aspiration.

The terminology used – threatened, at risk, vulnerable seems to be interchangeable and have little meaning – or relationship with the threat classification system. There is currently no recognition of role of environmental NGOs in the vision.

We believe that the proposed vision should be brief, clear and inspirational.

Aichi Target 12 has all those elements:

*“By 2020 the extinction of known threatened species has been prevented and their conservation status, particularly of those most in decline, has been improved and sustained”;*

If there was greater funding more species could be assessed and managed. ECO considers the public of New Zealand wants the Government to show a greater commitment to investment in biodiversity conservation.

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<sup>1</sup> (MPI 2013) **National Plan of Action - 2013 to reduce the incidental catch of seabirds in New Zealand Fisheries.**

<sup>2</sup> (MPI 2014) **NPOA-National Plan of Action for the Conservation and Management of Sharks 2013.**

The Statistics New Zealand general social survey (GSS) carried out among almost 9000 Kiwis during 2016 and 2017, and found natural scenery and environment topped a list of things Kiwis consider as defining to New Zealand. This was ahead of farming and agriculture

## **2. Are there additional aspects that you think should be included in the vision**

The vision should be clearer and more succinct, and should and could reflect the Biodiversity Strategy;

*“The full range of New Zealand’s indigenous ecosystems and species thrive from the mountains to the ocean depths;”*

*This includes: **Goal Three: Halt the decline in New Zealand’s indigenous biodiversity** Maintain and restore viable populations of all indigenous species and subspecies across their natural range and maintain their genetic diversity.*

Or from the action plan:

*“By 2025, the extinction of known threatened species has been prevented, and the conservation status, particularly of those most in decline, has been sustained or improved.”*

## **3. Do you agree with the characterisation of the value and current state of our native species?**

### **Response:**

Recovery planning should and could be informed by consultation with on the ground organisations that are working in areas or with species that are threatened or at risk, and that consultation with such groups should also be a tool that is identified as important.

Captive management has limited value, in that it contributes little to the natural ecosystem. We are concerned that this tool not be relied on in any situation other than where the numbers of species are so low that there are no other options; we also believe that instances where this is used for fauna must ensure that natural behaviours are encouraged, and that human handling is minimised. For further thoughts here see ECO Submission on the Kiwi Recovery Plan 2017-2027

Regulation should also refer to monitoring and compliance, there are currently areas that are protected, but that protection is able to be removed to make way for economic activities such as mining. Any regulatory protections must be strengthened and any erosion of them should be closely monitored and cumulative effects considered.

## **4. Have we identified the right tools (outlined in “The right tools for the job” section) to help us achieve the vision?**

**Response:**

Yes and No – yes you have identified some of the tools but missed other which are crucial especially in the marine environment, on private land and conservation land subject to mining or other economic devastation.

Recovery planning should and could be informed by consultation with on the ground organisations that are working in areas or with species that are threatened or at risk, and that consultation with such groups should also be a tool that is identified as important.

Captive management has limited value, in that it contributes little to the natural ecosystem. We are concerned that this tool not be relied on in any situation other than where the numbers of species are so low that there are no other options; we also believe that instances where this is used for fauna must ensure that natural behaviours are encouraged, and that human handling is minimised. For further thoughts here see ECO Submission on the Kiwi Recovery Plan 2017-2027

ECO welcomes greater focus on biosecurity and the careful and appropriate use of biocontrols for weed species.

Regulation should also refer to monitoring and compliance, there are currently areas that are protected, but that protection is able to be removed to make way for economic activities such as mining. Any regulatory protections must be strengthened and any erosion of them should be closely monitored and cumulative effects considered.

The current species based legislation, Wildlife Act, Marine Mammal Protection Act are not fit for purpose to protect biodiversity. The Department and the Government needs to give priority to upgrade conservation legislation for the 21<sup>st</sup> Century so that it protects biodiversity.

The National Plans of Action should be recognized eg on Seabirds and Sharks.

ECO notes that so far two marine species have been listed under the Marine Mammals Protection and no species have been listed under the provisions of the Wildlife Act or the **Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012**. This lack of action is in spite of there being well over 100 threatened marine species.

There are no adopted population management plans under the Wildlife Act or the Marine Mammal Protect Act to give legislative protection to species threatened by fishing. ECO acknowledges that the provisions are poorly written and difficult to enforce and should be a priority are for review.

**5. Are there other tools we could use to help us achieve the vision?**

**Response:**

Collection of genetic data could also be included as a valuable method.

The current species based legislation, Wildlife Act, Marine Mammal Protection Act are not fit for purpose to protect biodiversity. The Department and the Government needs to give priority to upgrade conservation legislation for the 21<sup>st</sup> Century so that it protects biodiversity.

The National Plans of Action should be recognized eg on Seabirds and Sharks.

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There are no adopted population management plans under the Wildlife Act or the Marine Mammal Protect Act to give legislative protection to species threatened by fishing. ECO acknowledges that the provisions are poorly written and difficult to enforce and should be a priority are for review.

The advocacy which the Department needs to implement this strategy and the **New Zealand Biodiversity Action Plan 2016–2020** will not occur if it is subject to the ongoing whole of Government approach. This just means that economic agencies trump the Department of Conservation and the strategy provisions will be doomed to fail

## **6. Will the proposed goals help us achieve the vision and assess our progress?**

### **Response:**

No the goals are not broad enough and have a terracentric focus.

We would suggest that Goal 1 be a far bigger goal – i.e. include many more of our 3000 threatened/at risk species; the goal being so small to start seems to imply a lack of enthusiasm or will.

Goal 2 should also refer to habitat protection and conservation; species need more than just having their number increased i.e. via captive management.

ECO does not want examples where conservation of species in situ is sacrificed for economic activity and left to languish in fridges.

Goal 3 is a little generic, but the intent is admirable.

We believe that linking goal 4 to the National Science Challenge is not ideal,; these challenges have a stated mission of enhancing New Zealand's economic growth. Biodiversity has an intrinsic value that goes beyond its ability to enhance economic growth. The focus should be on public good elements of science for the conservation of biodiversity and indigenous ecosystems.



## 7. Are there alternative goals that you think will better achieve the vision and assess our progress?

### **Response:**

The Department should consider the Aichi Targets as well as the goals in the original Biodiversity Strategy.

*Maintain and restore viable populations of all indigenous species and subspecies across their natural range and maintain their genetic diversity.*

There needs to a goal of developing a comprehensive baseline data of any species for which that isn't currently available, including data deficient species. Many of the invertebrates, especially in the marine environment have not been assessed of their threatened state.

The strategy should have a goal of ensuring no further species become threatened.

## 8. Have we identified the right strategic themes?

### **Response:**

The strategic themes, as written have a terracentric focus. Many of these issues are relevant to the marine or freshwater environment as they are to land based species.

To give wider recognition to species that breed in New Zealand which also migrate out of our EEZ, all species should be categorized under NZ and IUCN criteria. This would improve the advocacy for threatened New Zealand species eg as set in the National Plan of Action on Seabirds<sup>3</sup> – this is set out as:

- vi) *active co-operation is established with other countries whose vessels have interactions with seabirds, particularly those that breed in New Zealand, including through relevant RFMOs and through bilateral information sharing and assistance where relevant.*

Theme 1, uniting. Reference should be made here to grass roots projects and ensuring that these get greater support and resourcing. Many of our most successful predator programs operate at this level, and also promote a sense of ownership within their communities.

One of the biggest invaders to unite against is destructive economic activity (eg mining, industrial agriculture and industrial fishing) which undermines and threatens the habitats and ecosystems which our threatened species rely on.

Theme 2: Building our science and knowledge base - should also reference finding better ways of eradicating with pests and pathogens

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<sup>3</sup> (MPI 2013) **National Plan of Action - 2013 to reduce the incidental catch of seabirds in New Zealand Fisheries.**

Theme 3: Focusing beyond public conservation land – should consider the marine, coastal and freshwater environments and threats to species that live or rely on those ecosystems. The seascape or freshwater scape can be just as important as the landscape.

Education is missing from the themes – and indeed from much of the strategy while it is in the Action Plan.

## 9. Do you agree with our top 10 actions? -

### **Response:**

Again there are many gaps. No the goals are not broad enough and have mainly a terracentric focus.

Education is a missing element.

Climate Change, appropriate legislation for dealing with the effects of climate change, and assessments of the impacts of climate change on threatened species should be included.

Strengthening other legislation to provide better protections should also be a priority.

It is essential that marine protection is focused on marine reserves and species protection measures and covers the EEZ. A key element is to establish the Kermadecs Sanctuary as set out in the Strategy Action Plan.

The current species based legislation, Wildlife Act, Marine Mammal Protection Act are not fit for purpose to protect biodiversity. The Department and the Government needs to give priority to upgrade conservation legislation for the 21<sup>st</sup> Century so that it protects biodiversity.

The National Plans of Action should be recognized eg on Seabirds and Sharks.

ECO notes that so far two marine species have been listed under the Marine Mammals Protection and no species have been listed under the provisions of the Wildlife Act or the **Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012**. This lack of action is in spite of there being well over 100 threatened marine species.

There are no adopted population management plans under the Wildlife Act or the Marine Mammal Protect Act to give legislative protection to species threatened by fishing. ECO acknowledges that the provisions are poorly written and difficult to enforce and should be a priority are for review.

The advocacy which the Department needs to implement this strategy and the *New Zealand Biodiversity Action Plan 2016–2020* will not occur if it is subject to the ongoing whole of Government approach. This just means that economic agencies trump the Department of Conservation and the strategy provisions will be doomed to fail

The freshwater reforms as currently agreed will not protect New Zealand's indigenous biodiversity we need to do better. This will need a change in focus in the Department and greater recognition of non-economic values in water.

## 10 **Are there any other actions that should be included, and any actions that should be removed?**

The plan seems to rely fairly heavily on existing projects to manage some areas, like Predator Free 2050. While these projects are good, there is a need for many more methods to achieve what should be the overarching vision of this Strategy, to prevent extinction, halt decline and increase populations of threatened species. Other actions that could be included include the introduction of new protective instruments that would afford far greater protection for environments that are known to be habitat to threatened species, particularly where there is an economic argument for compromising those environments.

Again there are many gaps. No the goals are not broad enough and have mainly a terracentric focus.

Education is a missing element.

Climate Change, appropriate legislation for dealing with the effects of climate change, and assessments of the impacts of climate change on threatened species should be included.

Strengthening other legislation to provide better protections should also be a priority.

It is essential that marine protection is focused on marine reserves and species protection measures and covers the EEZ. A key element is to establish the Kermadecs Sanctuary as set out in the Strategy Action Plan.

The current species based legislation, Wildlife Act, Marine Mammal Protection Act are not fit for purpose to protect biodiversity. The Department and the Government needs to give priority to upgrade conservation legislation for the 21<sup>st</sup> Century so that it protects biodiversity.

The National Plans of Action should be recognized eg on Seabirds and Sharks. There should be a clear focus on reducing to negligible levels the impacts of fishing on biodiversity.

ECO notes that so far two marine species have been listed under the Marine Mammals Protection and no species have been listed under the provisions of the Wildlife Act or the **Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012**. This lack of action is in spite of there being well over 100 threatened marine species.

There are no adopted population management plans under the Wildlife Act or the Marine Mammal Protect Act to give legislative protection to species threatened by fishing. ECO acknowledges that the provisions are poorly written and difficult to enforce and should be a priority are for review.

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**11. Have we identified the right number of priority species?**

(Circle or highlight one) • Too many • About right • **Too few**

**Response:**

The priority list of threatened species is driven by the level of funding available. At this level of funding and engagement it is likely that more species will be threatened adding to the problems for the Department.

There needs to be a stronger focus on maintaining biodiversity.

For example the bird species does not include black petrels which has been identified as the most at risk seabird species due to fishing impacts.

**12. Have we identified the right priority species?**

**Response:**

No. Again it seems to be a funding issue rather than a priority issue.

For example the bird species does not include black petrels which has been identified as the most at risk seabird species due to fishing impacts.

**13. Do you think other species should be prioritised ahead of the ones listed?  
And why?**

**Response:**

The strategy should be clearer on the way priorities are identified and consideration should include species that have not been assessed (eg data dependent or groups that have yet to be assessed) or are not endemic species but make up the New Zealand fauna.

**14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?**

**Response:**

No due to key issues already identified:

- ) absence of proposals to strengthen DoCs legislative mandate - all that has happened in the last 10 years is in the opposite direction;
- ) absence of increased funding stream to implement the strategy
- ) that we are losing species in the non-threatened or managed areas.

- ) The strategy is unclear how it fits with the wider Aichi targets;
- ) Clear advocacy by the Department which is not trumped by development agencies in a whole of Government approach.

It is unclear the status of the ***New Zealand Biodiversity Action Plan 2016–2020*** as it has not been developed and consulted on as a “participatory” plan as required by Aichi Target 17.

## Conclusion

Finally, ECO is grateful for the opportunity to have input into this policy and for the consideration that you give to this submission. ECO would welcome an opportunity to discuss this submission with the Department.

We hope it is useful to the process.

Best regards,



ECO Co-Chair.



**From:** [REDACTED]  
**Sent:** Tuesday, 1 August 2017 6:56 a.m.  
**To:** threatenedspeciesstrategy; [REDACTED]  
**Subject:** 1080 poison

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I demand the immediate cessation of the use of 1080 poison baiting in New Zealand! This poison is an inhumane, insidious and indiscriminate way of exterminating animals - it poses a danger to any animal or human that may unwittingly come across it and consume it as it is scattered randomly in wildlife areas, forests, farms and national parks!

Thank you,

[REDACTED]



Virus-free. [REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, 1 August 2017 8:45 a.m.  
**To:** threatenedspeciesstrategy  
**Cc:** [REDACTED]  
**Subject:** 1080 poison

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi,

I demand the immediate cessation of the use of 1080 poison baiting in New Zealand! This poison is an inhumane, insidious and indiscriminate way of exterminating animals - it poses a danger to any animal or human that may unwittingly come across it and consume it as it is scattered randomly in wildlife areas, forests, farms and national parks!

[REDACTED]



# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

Organisation name:  
(if on behalf of an organisation)

Email:

Signature:  
(we accept a typed signature if  
no electronic signature)

## Objections:

### You can answer all or some of the questions.

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

If you honoured the karakia in the beginning:  
If the land is well  
And the sea is well  
The people will thrive?  
. . . all would be well:

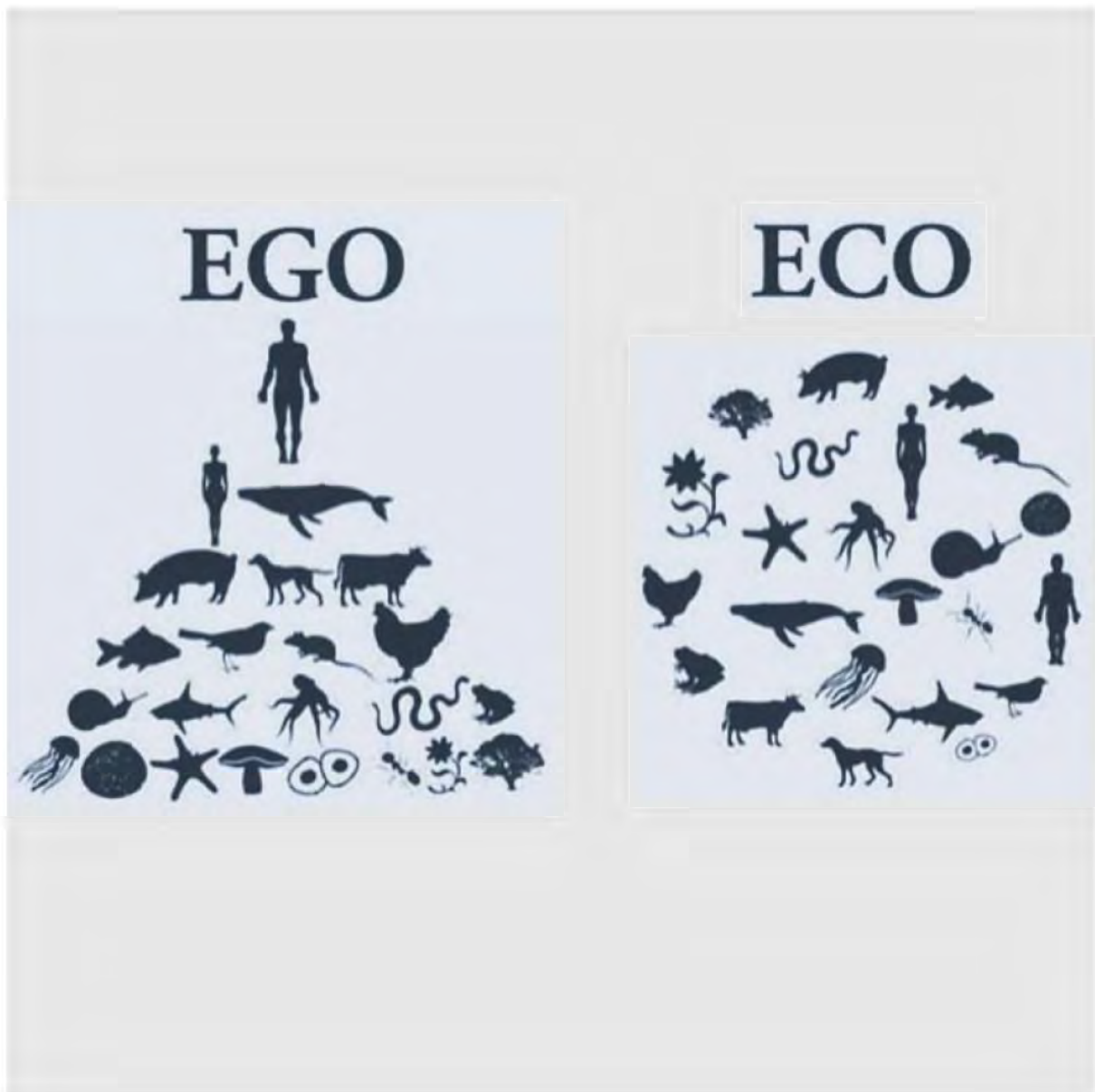
but this strategy will increase the damage to the land the sea and ultimately the people:  
who are already struggling under a toxic burden which sees 287 foreign chemicals in the placentas of 10 new born babies – and that was in 2005 – the figure could be astronomical by now:  
and is reflected in the increasing rapid rate of chronic disease and ill health:  
and reflected no doubt in the ailing of our iconic species like kauri:  
2 fold increase in Parkinsons,  
3 fold increase in Alzheimers,  
60% increase in breast cancer in women under 45 years old in just 11 years,  
40 % increase in childhood cancers in just 13 years:  
exponential growth in autism:  
and an ocean with more plastic than fish by 2050;  
and doubt whether the Great Barrier Reef will even be there by then:

Our iconic species are not like our national monuments – they are part of a living ecosystem – the whole of which needs to be looked after:  
This is pure indulgence of our ego and the rest of the living world is paying the price.

By all means develop a living collection of plants and protect crucial habitats of as many species as possible by intensive monitoring and surveillance, study and targeted intervention if the money is there to do it – but not with toxic and polluting and inhumane substances and practices which are counter-productive to a vibrant and healthy eco-system.

What an ego to proclaim New Zealand is the greatest living space on earth!

You need a rapid shift in consciousness from ego to eco before you do any more damage!



This attitude is a great threat to humanity and our children's futures  
 Predator Free 2050 is not only unrealistic but it is going to do even more damage  
 than what has already been done to our environment by toxic & unnecessary  
 chemicals, bad farming practices and other 'developments';  
 And the 'breakthrough science solution' sounds suspiciously like a GE proposal  
 which would destroy the premium we enjoy on our organic products for export.

DOC has already shown it cannot be trusted to deliver the data needed to assess  
 the desirability of any strategy let alone the implementation:  
 it has coerced people into describing compensation for 1080 casualties as stock feed  
 or tack maintenance . . . and numerous other fudging of data meaning we do not

have a sound basis for rolling any strategy out until proper unbiased research is done and assessed independently.

You 'invite all New Zealanders to be a part of that effort' and yet continue to ignore the very real concerns of 60+% who don't want aerial 1080:

The Battle for our Birds has seen the rock wren decimated and the kea similarly brought to its knees

While the lies are still pedalled through your presentations about beech mast and rat plagues of biblical proportions without the evidence to back them up.

While you work on iwi until most of them buckle to the pressure – or the inducements?

#### THE FIVE THEMES

And the overall attitude displayed in Predator Free 2050

The Battle for our Birds

And War against Weeds

Are totally inappropriate and give children in particular

Who you and F&Bird and others – like the Norgan Foundation – are targeting through schools and other programmes

The nasty goal of uniting against invaders

Complete with ridiculing and parading their unfortunate victims

And gloating over their 'killing prowess'

This is not something to be proud of – unless of course you are proud to be breeding psychopaths devoid of love and compassion for their fellow creatures?



The drowning of baby possums at a south Auckland school  
And the dressing up and ridiculing of them at another school gained international condemnation:

And I can only think that [REDACTED] comments were his diplomatic way of saying how cruel and inhumane NZ is because any fool would know that they don't 'die with a smile on their faces' and he wouldn't be where he is today if he were a complete fool would he?

#### IT MIGHT BE AN IDEA TO HAVE GOOD UNBIASED RESEARCH

To back up your Goals before rushing headlong into what may prove disastrous for far more species than your 'prioritised threatened and at risk ones;  
Like the date deficient species you acknowledge yourselves.

There is no mention in your species list of the vital subterranean ones  
And considering the importance of the humble earthworm and the microbiome as well this illustrates the incompleteness or insufficiency of your vision.

Whilst you trumpet the success of one kiwi you also admit the increased vulnerability of many more of our unique species . . . maybe the direction is wrong?  
60 years of 1080 use – and all the other tools you have used are obviously not successful and yet you propose using more.

What if they are at the root of the problem?

As you say yourselves

'Everything is connected . . . .

and yet you barrel in with toxic chemicals in an ever increasing amounts and variety and wonder why you have systems collapse.

Then try to point finger at plastic pollution and other practices instead of cleaning up your own act first.

You War on Weeds identifies the Dirty Dozen weeds;

But you conveniently ignore the Dirty Dozen Chemicals – of which 1080 is the worst especially since it is dropped from the air and over watercourses which may even be directly into some people's water supplies.

'Knowledge gaps are a significant challenge' and yet you continue to blindly forge ahead despite much evidence that you are doing more harm than good!

If you want everyone to take responsibility for the survival of our unique species then the environment needs to be safe for us to venture into and at the moment it's not!

Your Call to Action invites all NZers to play their part and yet risks their health and well being in so doing.

You refuse to recognise the extreme danger from 1080 poison

And instead post up inaccurate justification for it's continued use

While admitting that it is 'of limited use in other countries because there are native animals that they cannot risk harming' . . .

WELL I'M A MAMMAL & SO ARE MY CHILDREN!

I have never seen a beech mast in the Hunuas

And the terrain is certainly not inaccessible

PLEASE TAKE NOTE

[www.1080science.co.nz](http://www.1080science.co.nz)

Top of your TOP 10 ACTIONS is Predator Free 2025

And Investing in improving tools and technologies where you identify 1080 as a mission-critical tool for conservation.

Isn't it time to evaluate how much this, and brodifacoum and glyphosate and pindone and . . . . , has and is contributing to the enormous health problems NZ 'ers have to contend with now?

The EPA 's ruling on glyphosate is scandalous in light of the machinations of the manufacturer:

<https://www.cornucopia.org/2016/05/unwho-panel-conflict-interest-row-glyphosate-cancer-risk/>

<http://press.gefree.org.nz/press/20160816.htm>

Is it because women are more at risk that it doesn't matter to you?

<http://www.wecf.eu/english/articles/2014/12/women-chemicals.php#.V5RCtWKfTVc.facebook>

We cannot continue to gamble with our children's health – but you are doing just that!

<https://ehp.niehs.nih.gov/EHP358/>

It took over 40 years to get any realistic regulation of mercury after the Myanmar disaster and still people resist the overwhelming evidence that it is not safe in any dose:

1080 and all the others are likely to prove the same and yet you are prepared to risk our children in this way?

[www.braindrain.dk](http://www.braindrain.dk)

And even worse consider unleashing the GE bomb?

<http://press.gefree.org.nz/news.htm>

██████████ was in Auckland this month and it is a shame you all didn't manage to attend one of his informative talks because maybe that would have given you insight into why what you're proposing in this strategy is so far off course.

I have emailed the account of this in a separate email from [BirthRightKiwi@gmail.com](mailto:BirthRightKiwi@gmail.com)

2: Are there additional aspects that you think should be included in the vision?

YES – as above

3: Do you agree with the characterisation of the value and current state of our native species?

No

4: Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?

No

5: Are there other tools we could use to help us achieve the vision?

Yes

6: Will the proposed goals help us achieve the vision and assess our progress?

No

7: Are there alternative goals that you think will better achieve the vision and assess our progress?

Yes

8: Have we identified the right strategic themes?

No

9: Do you agree with our top 10 actions?

No

10: Are there any other actions that should be included, and any actions that should be removed?

Remove 1080 and all other unnecessary toxic and polluting substances and practices

11: Have we identified the right number of priority species?

(Circle or highlight one) • Too many • About right • Too few

**Comments:**

12: Have we identified the right priority species?

No

13: Do you think other species should be prioritised ahead of the ones listed? And why?

All species should be given the best chance possible – i.e. an overall approach to maximise the survival of all species

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

No

15: Do you have any further comments regarding the draft Strategy that is not covered above?

You have mapped a road to disaster.



Ngāti Rangi Trust  
1 Mountain Road, PO Box 195  
Ohākune 4625, New Zealand

Office: +64 (0)6 385 9500  
Fax: +64 (0)6 385 9501  
Email: [office@ngatirangi.com](mailto:office@ngatirangi.com)  
[www.ngatirangi.com](http://www.ngatirangi.com)

31 Hongongoi 2017

Threatened Species Strategy  
Department of Conservation  
PO Box 10420  
Wellington 6143  
[threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

A submission by **Ngāti Rangi Trust** on:

## DRAFT THREATENED SPECIES STRATEGY

### 1. Ngāti Rangi Trust

- 1.1 Ngāti Rangi Trust is the iwi authority for Ngāti Rangi, an iwi based on the southern slopes of Matua te Mana, or Ruapehu. Our cultural identity is linked to his essence, the lifeblood of our people cascade as waters from his slopes, his peaks above are our sacred altar. The vision statement for Ngāti Rangi is:

*“Kia mura ai te ora o Ngāti Rangi nui tonu ki tua o te 1,000 tau.*

*Ngāti Rangi continues to vibrantly exist in 1,000 years”.*

- 1.2 Our vision statement stands as a testament to our role and responsibility to be active kaitiaki for our environment, the flora and fauna, to ensure our descendants, in 1,000 years time have access to clean water, fresh air and uncontaminated land. The health and wellbeing of our people is reflected in the state of our environment and in the mouri of our waterways.
- 1.3 As caretakers within our tribal lands, our responsibility is to ensure that the quality of our environment; our air, water and land, is of a better state, but at the very least, no worse than the conditions that exist currently. In order to fulfill these responsibilities we look for mechanisms that safeguard our environment; such as the Draft Threatened Species Strategy.

## 2. General Comments

2.1 Ngāti Rangi Trust understands that the health and wellbeing of our native species rests on the several factors but presumably, the existence and spread of predators heavily affects this. There is a heavy focus on Predator Free 2050 which indicates that this is a primary driver of the decline in our native species. Our desirable outcome for the state of our species is for balance within our environment and that reflects a vibrancy of all species at a local level.

2.2 Ngāti Rangi have engaged in the New Zealand Indigenous Flora Seed Bank driven by Massey University alongside and supported by other national agencies since its inception. We recognise that our environment is fragile and at risk from climate change, pollution and predator predation. Our purpose is to ensure that our taonga species throughout our tribal boundaries have the opportunity to be safeguarded against these threats. Our primary concerns surrounding seed collection and storage are outlined as follows:

- Storage in facilities outside of New Zealand
- Decisions made regarding research on seeds collected without discussion or consent from Ngāti Rangi
- The lack of concern regarding WAI 262 and the protection of the intellectual property or mātauranga-ā-iwi
- Commercial based agendas with seed storage
- Risks of genetic modification
- Unused or germinated seeds to be returned to sites of extraction.

2.3 Ngāti Rangi, like many other iwi around Aotearoa, are heavily involved in the management of our environment and remain connected to our special places. Despite the connections that still exist, specific tribal practices such as the harvesting of kai and rongoā has been heavily impacted on for generations.

Therefore, being able to undertake a sustainable cultural harvest of kai and rongoā reflects the vision and desire of the future state of our threatened species. However, to achieve this vision, Ngāti Rangi need to understand better the status of our native flora and fauna at our **local level** and therefore recommend that an outcome for this strategy is to recognise localised native species that require a place within this strategy.

Another factor to support the vision of this strategy for Ngāti Rangi is for a healthy environment that is able to allow the reintroduction of locally extinct species such as the tītī.

2.4 Ngāti Rangī hold significant concerns that not enough focus is being applied to the protection and recovery of our native freshwater species. With the poor condition of many of our nations waterways, the weak guiding policy that do not protect the health and well being of Te Mana o te Wai; the decline and local extinction of our freshwater species is imminent.

With waterways being a significant focus for Ngāti Rangī and our environmental management, we contest that all native freshwater fauna are added to this threatened species list to enable the following;

- Research on all native freshwater fauna to understand better their population distribution, all facets of their life cycle etc. Until more research has been gained on our native freshwater fauna, we cannot assume that these species are healthy and vibrant without more knowledge.
- Stronger protectionary measures enforced and promoted by the Department of Conservation.
- Stronger environmental monitoring and advocacy for better quality waterways.

2.5 Stronger protection and promotion of better quality waterways is required by the Department of Conservation to address the issues we have with freshwater and the detrimental impacts its poor quality has on our freshwater fauna. Our freshwater ecosystem health requires a multi-faceted approach from primary industry, users, and the public to ensure that our freshwater fauna are given the best opportunity for survival.

2.6 Ngāti Rangī understand the benefits that research brings to understanding our environment and its species. We also acknowledge the significant gaps that are present with our native flora and fauna and therefore support the prioritisation of research on data deficient species.

2.7 All native species has a place and function within our taiao. We hold reservations that the target number outlined for this strategy is far too low and does not adequately reflect the current demise of threatened species within Aotearoa. However, we recognise that the Department of Conservation in its current state may not be able to achieve above this species threshold.

With respect, we seek alternative solutions that can assist the Department of Conservation with achieving the core outcome of this strategy such as;

- Increased funding for the Department of Conservation nation wide to support staff in achieving the goals set out in this strategy. Whilst relying on partnerships and collaborations is an essential element to the sucess of the Department, they still requires a heavy injection of funding to further support staff to achieve these outcomes.

- Increased funding and resources will enable an increase in staff numbers where required in order to further support this strategy as well as other core work of the Department.
- Increased funding can also enable capacity building within local communities, whānau, hapū and iwi.
- Ngāti Rangi Trust are currently engaging with the Crown on our Treaty Settlement and therefore recognise that strategic collaboration on specific projects is perhaps part of the future potential for iwi around Aotearoa.

We appreciate that the primary work undertaken by the Department is integral to the health and wellbeing of our native species and the wider environment, however additional support is required to adequately engage in this space for the future of our native species.

Ngāti Rangi also recognise that a better alignment with other government departments' and their environmental approaches is vital to the recovery of our threatened native species on areas such as;

- Climate change
- Economic development
- Tourism
- Treaty negotiations
- Primary industries
- Education
- Environment
- Energy and resources
- Science and innovation

Working in competition with these agencies is at the detriment of our declining native species, and therefore we expect the government to continue advocating for the preservation of our environment and our native species before competing interests create more demise within this space.

2.8 Ngāti Rangi require continued discussions around proposed pest control measures, methods and approaches to achieve the Predator Free 2050. In principle, Ngāti Rangi do not support the poisoning of our taiao by way of 1080. We therefore recognise that a mixed method approach towards predator control is a requirement. The continued protection of our significant sites, our taonga species, and the mouri<sup>1</sup> of our whenua and waterways is integral of our people.

---

<sup>1</sup> Mauri: Ngāti Rangi mita

2.9 We agree that the Top 10 actions will aid in the positive future state of threatened species. We however insist that point 6. Of the Top 10 Actions incorporate and promote Te Mana o Te Wai as part of this action to ensure that first and foremost, the river’s health and wellbeing is protected. This in turn cultivates the health and wellbeing of our native freshwater fauna. This holistic approach is supported by Ngāti Rangī.

**3. Final Comments**

3.1 Overall, we support the bones of this strategy and believe that small changes can provide extra benefit to the future health and wellbeing of our native species. We recognise that the responsibility of our species protection lies wider than the Department of Conservation and is also our responsibility as ahi-kā of our rohe at the southern slopes of Ruapehu.

Heoi anō,

[Redacted signature block]

# New Zealand's Threatened Species Strategy: submissions for consultation

## Once you have completed this form

Send by post to: Threatened Species Strategy, Department of Conservation, PO Box 10420 Wellington 6143 or email to: [threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

## Submissions must be received no later than 5 pm Monday 31 July 2017

Anyone may make a submission, either as an individual or on behalf of an organisation.

### Submitter details:

Name of submitter  
or contact person:

[REDACTED]

Organisation name:  
(if on behalf of an organisation)

Email:

[REDACTED]

Signature:

[REDACTED]

(we accept a typed signature if  
no electronic signature)

## Submission:

### You can answer all or some of the questions.

1: Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

*No – in some ways it sounds ambitious, e.g. increasing the number of species to be targeted, however it is woefully inadequate if it is to actually protect our wildlife as it is and it should be aiming to restore all extant species (of all taxa) to self-sustaining populations in their own natural (not current) range nationwide.*

*There are simple standards that should have been accepted as baseline e.g.*

- *All threatened and at risk species will be protected not just a fraction of them*
- *All threatened and at risk species that are conservation dependent will be under management that actually enables them to start recovery.*

*In realistic biogeographic terms, all of New Zealand is a string of islands including The North and The South Islands. Every bit of this country, not just minute, offshore sanctuary islands, ultimately needs to be predator free to actually offer supporting ecosystems. The Predator Free NZ by 2050 is a laudable start and has captured community support, however this is about a vision and the vision needs to be far more encompassing – wider areas, all species (feral cats, ferrets, mice). We can do it, New Zealand can become a leader nation in making this radical difference that others can follow. New Zealand has more endemic species than anywhere else in the world; we have this responsibility to ensure they make it through under our watch.*

*Similarly, the War on Weeds is far too limited. There are around 350 plant species causing a notable impact on wild ecosystems, removing 12 is a very small start. Containment and ultimately removal is possible just check out Matiu-Soames Island volunteers' achievements.*

*Aim higher please, this is hardly a vision of a desirable future in my eyes!*

2: Are there additional aspects that you think should be included in the vision?

*The main shortcoming seems to be that we know so little about what we are caretakers of that we dismiss vast chunks of our biodiversity before even drawing up our shortlist!*

*The majority of New Zealand's territory (Zealandia) is ocean, yet marine species are excluded with few exceptions; both more marine species and extensive tracts of marine habitats from shore to deep sea, must be included.*

*Species are singled out as representing their taxa yet the habitats that support whole functioning ecosystems, that we still barely understand, have not been considered. Habitats themselves should be included to give a true landscape scale to this management and give us a glimmer of hope to provide for threatened species, including those species not currently on the list or considered for the list such as fungi, lichens, algae and invertebrates. These living organisms make up the majority of our population by far and failure to recognize their potential and importance may result in devastating consequences as we ignore the small species at the bottom of the food chain in favour of the large, charismatic species at the top.*

*Nothing will be achieved if the whole vision is not backed by funding and by all authorities taking their responsibilities up fully. Actions of every government agency should accord to support the strategy and never to compromise the restoration of species. For instance, if we do not conserve our fish species we will have no fish to harvest; if we do not conserve our landscapes and all the species in it, there will be nothing 'special' for the tourists to visit us to experience.*

3: Do you agree with the characterisation of the value and current state of our native species?

*We have an amazing biodiversity inheritance, and yes it is in crisis. You have recognised that well. I am not sure that we actually know enough about what we have or how it interacts or how much threat any of it is under however.*

4: Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?

*The scientific structure to give direction all sounds good, only there does seem to be either an emphasis on community (volunteers) or on fenced and island sanctuaries. The majority of habitats and species need supporting in their natural range. And, if fenced sanctuaries are so important, why then has the DOC Community funding for Orokonui been taken away? Fine words, not so sure the actions are going to bear them out.*

5: Are there other tools we could use to help us achieve the vision?

*The primary tool that needs to be included is increased funding, especially to the government agencies tasked with carrying out this work; DOC. There is a public willingness for this and for funds to be raised through the tourism arm of DOC instead of DOC effectively funding tourism as it does at present.*

6: Will the proposed goals help us achieve the vision and assess our progress?



7: Are there alternative goals that you think will better achieve the vision and assess our progress?

8: Have we identified the right strategic themes?

*Add the need to create resilience in species and habitats not just survival.*

9: Do you agree with our top 10 actions?

10: Are there any other actions that should be included, and any actions that should be removed?

*Far more true reporting of how threatened and vulnerable the species are needs to be taking place; people think it is all in hand and getting solved yet the truth is most are still on their way to extinction. If they knew they would be more able and willing to support the drastic actions and funding needed.*

11: Have we identified the right number of priority species?

(Circle or highlight one) • ~~Too many~~ • ~~About right~~ • **Too few**

**Comments:**

12: Have we identified the right priority species?

*NO – more than 90% of species have not even been identified as non-priority species! No human should have the right to answer this question.*

*As a chiropterologist I am delighted that the two extant bat species are recognised in one or other list, however I am baffled by the data provided prior to this: I am aware that NZ has had in its history 4 species of bat, all endemic, *Mystacina miocenalis*, *M. robusta*, *M. tuberculata* and *Chalinolobus tuberculatus*. Why are 5 listed? There are many subspecies recognised and disputed however if these are mistakenly included then this only further supports your urgent need for more scientists to be working within this department. I am also concerned that specifically we have very little knowledge of the distribution or ecology of *C. tuberculatus* so are in a weak position to make any plans for its recovery. If this is the case for one species I know, I am slightly wary of judging the quality of the plans for the others.*

13: Do you think other species should be prioritised ahead of the ones listed? And why?

14: Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

15: Do you have any further comments regarding the draft Strategy that is not covered above?

# New Zealand's Threatened Species Strategy: submissions for consultation

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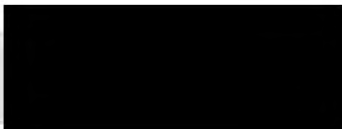
Alternatively, you can complete your submission online:  
[www.doc.govt.nz/draft-threatened-species-strategy-consultation](http://www.doc.govt.nz/draft-threatened-species-strategy-consultation)

**Submissions must be received no later than 5pm Monday 31 July 2017**

Anyone may make a submission, either as an individual or on behalf of an organisation.

## Submitter details:

Name of submitter or contact person:



Organisation name: (if on behalf of an organisation)

Email:



Signature:

(we accept a typed signature if no electronic signature)



## Submission:

You can answer all or some of the questions.

1. Does the proposed vision capture what you see as the desirable future state for threatened species in New Zealand by 2025?

*It's a minimum. More than "safeguarding," I would like to see ~~all~~ our vulnerable, <sup>threatened</sup> species increase and no more species become threatened.*

2. Are there additional aspects that you think should be included in the vision?

*Preservation of habitats*

3. Do you agree with the characterisation of the value and current state of our native species?

*Yes*



4. Have we identified the right tools (outlined in "The right tools for the job" section) to help us achieve the vision?

Yes, but conservation of species in the area where they are is more desirable than captive management or translocation, if it is at all possible.

5. Are there other tools we could use to help us achieve the vision?

The Dept of Conservation should be better funded to carry out its essential work. Conservation work will be carried out more effectively and efficiently by professionally trained staff whose career it is. Volunteers do a lot of wonderful work, which should be encouraged, but their use is sometimes counter-productive, as

6. Will the proposed goals help us achieve the vision and assess our progress?

Yes, they will help - but it will be better if we can exceed them.

when the takahē were shot

7. Are there alternative goals that you think will better achieve the vision and assess our progress?

8. Have we identified the right strategic themes?

Yes

9. Do you agree with our top 10 actions?

Yes - but if conservation of a species requires an action which is not listed, the fact that it is not listed shouldn't matter.

10. Are there any other actions that should be included, and any actions that should be removed?

11. Have we identified the right number of priority species?

(Circle or highlight one)

• Too many

• About right

• Too few

### Comments:

12. Have we identified the right priority species?

13. Do you think other species should be prioritised ahead of the ones listed? And why?

Weka - a celebrated endemic species, which has disappeared from most of its former range, including the entire eastern South Island. Most sanctuaries don't want it, because of its predatory habits.

14. Taken together, do you think the proposed vision, focus themes, goals and actions on the identified species will set the framework for safeguarding our vulnerable threatened species?

They are a good start, but if we can achieve more, that would be better.

Submission from

**Canterbury Aoraki Conservation Board Te Runanga Papa Atawhai o Waitaha me Aoraki**  
on the

## **New Zealand Threatened Species Strategy 2017 (Draft)**

Canterbury Aoraki Conservation Board Te Runanga Papa Atawhai o Waitaha me Aoraki (the Board) congratulates those involved in drafting the threatened species strategy which pulls together many existing policies and initiatives. The Board generally supports the priorities identified and actions proposed.

While the Board endorses the strategy direction members would like to see the allocation of more resources each year become an integral part of the strategy for threatened species management. It is the Boards view that increased resources are essential for this ambitious strategy to succeed.

One aspect which the Board considers should be given greater weight is the urgent need to slow and stop the rate of habitat loss for threatened species. While some species may survive in cultivation, seed banks, or captivity, sustainable wild populations of threatened species will not survive in the long run unless the complex ecological systems which support them are also protected. Maintaining habitat is fundamental to species survival and is just as important as managing threats, if not more so.

The Board is encouraged to see references throughout the document to partnerships of all kinds. However this is not reflected in the Top 10 actions. The Board recommends the Top 10 actions also include:

- Supporting and aligning the work of communities, conservation organisations, schools, industry sponsors and other groups in the delivery of programmes to protect threatened species.
- Supporting and aligning tourism industry services, experiences, and sponsorships to further support the delivery of programmes which protect threatened species.

This will build engagement as well as help to protect threatened species.

Thank you for allowing us the opportunity to comment on this very important piece of work.

██████████  
██████

[Redacted]

A further submission here which we should accept – No 190 by my count, and NSC would make 191.

Cheers, Norm

[Redacted]

[Redacted]

[Redacted]

prosperity *Tiakina te taiao, kia puawai*

[www.doc.govt.nz](http://www.doc.govt.nz)

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Please accept this late submission.

Threatened Species Strategies.

[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]

I would like to present at the hearing.

I am a member of Forest and Bird, Bream Bay Coastal Care Trust, been a DOC volunteer and assist in our local wildlife refuge.

I have a Bachelor of Horticultural Science.

I have no pecuniary interests in the DOC estate.

- 1 I see room in the strategy to have greater control of human interference in areas ecologically sensitive areas.
- 2 The Department requires greater regulatory and enforcement powers to have effective control in order meet measurable outcomes.
- 3 The Department of Conservation requires higher levels of funding to be able to achieve the outcomes required by the strategy.
- 4 Department of Conservation requires a staffing policy that will provide greater employment security to retain staff whose experience often can only be attained in the field. This is important to maintain institutional memory, knowledge and culture and ensure succession. The management of species is highly specialised work.
- 5 The Department of Conservation needs policies to deal with recalcitrant local government industry and developers who threaten the integrity of ecologically sensitive areas of the DOC estate.
- 6 The Department of Conservation consult meaningfully the the public at a national level at the earliest stages of any proposal to use genetically modified organisms as a means of pest control.

thank you



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Friday, 11 August 2017

Department of Conservation

[threatenedspeciesstrategy@doc.govt.nz](mailto:threatenedspeciesstrategy@doc.govt.nz)

### **Submission on Draft Threatened Species Strategy**

The Environment Institute is a not-for-profit, professional association for environmental practitioners from across Australia and New Zealand. The Institute supports environmental practitioners and promotes independent and interdisciplinary discussion on environmental issues. The Institute also advocates environmental knowledge and awareness, advancing ethical and competent environmental practice.

The draft 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. The Strategy identifies further steps we need to take not only to restore those species that are already at risk of extinction, but also to prevent others from becoming threatened.

The Strategy aims to safeguard our vulnerable threatened species, by establishing clear goals for increasing the number of threatened species we (Department of Conservation, Councils, other agencies and the public) are working on, and prioritises some threatened and at risk species for intensive management to set them on a path to recovery by 2025.

The the vision proposed goals are sound:

1. Manage 500 species for protection by 2025 and 600 species for protection by 2030.
2. Enhance the populations of 150 prioritised threatened and at risk species by 2025.
3. Integrate Te Ao Māori (the Māori world view) and mātauranga Māori (Māori knowledge) into species recovery programmes by 2025.
4. Support research, particularly through the National Science Challenges, that helps us to better understand data deficient species.

Although EIANZ has concerns that the statutory tools to protect and allow for threatened species habitat on both private and public land are exceedingly slow.

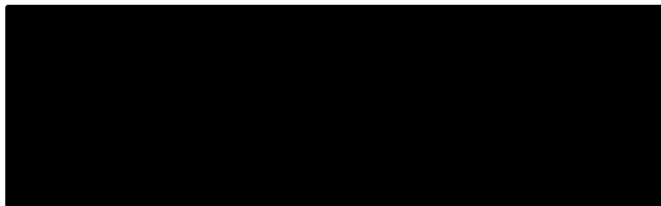
There does appear to be one significant gap in the strategy – engaging local government and private landowners in protecting threatened species habitat and eliminating pests from private land.

- Page 25 of the draft implies that there are regulatory tools to protect threatened species habitat, this not the case; the Wildlife Act only protects habitat on conservation reserves and covenants.
- We cannot rely on RMA zoning and rules to protect threatened species habitat, without a National Policy Statement for Biodiversity (that addresses this matter), and then it may take up to a decade to get appropriate measures in place.

- In some cases Central and Local Government may need to consider measures to address significant loss of production values when private land is taken out of production for the protection of threatened species habitat e.g. transferrable development rights (currently used in Auckland, Waikato and Bay of Plenty regions).

EIANZ welcomes and strongly supports the Threatened Species Strategy, the approach taken, the goals and the timelines proposed.

Regards

A large black rectangular redaction box covering the signature area.A short black horizontal redaction bar.A medium-length black horizontal redaction bar.A long black horizontal redaction bar.



14 August 2017

Norm Kelly

Threatened Species Strategy Project Manager

Department of Conservation

Wellington

By email: [nokelly@doc.govt.nz](mailto:nokelly@doc.govt.nz)

Teena koe Norm,

## SUBMISSION ON THREATENED SPECIES STRATEGY

Thank you for agreeing to accept a late submission on this topic. This is a short submission to highlight frustrations in the overall approach to focus effort on threatened species in Aotearoa New Zealand.

As you may understand, as tangata whenua, our focus is on our rohe, which stretches from the Patea River to the Whanganui River and inland. Over our lifetimes, we have seen a significant decline in species of cultural value to us. These include non-threatened coastal species that we are no longer able to access as well as many other bush species that are just not seen in the same numbers.

These species are as equally precious to us as those that make the list of 150. We also understand some of these non-listed species will benefit from wider pest control or other conservation measures. However, choosing only 150 top threatened species, regardless of the sophistication of the tool, is not acceptable.

Reacting if there is only a threat of extinction is not upholding a Treaty of Waitangi-based relationship and is completely unsatisfactory. There has been too much loss and damage to our biodiversity. More focus and funding is required on all species in decline.

Naaku noa, naa

Kaiwhakahaere