

3 November 2023

Ministry for the Environment
biocredits@mfe.govt.nz

Dear Manatū Mō Te Taiao (Ministry for the Environment)

Submission on Helping nature and people thrive – Exploring a biodiversity credit system for Aotearoa New Zealand.

Ngā mihi nui ki a koutou kātoa. Whakatāne District Council is grateful for the opportunity to submit on the Ministry for the Environment's exploration of a biodiversity credit system for Aotearoa New Zealand. We acknowledge the extensive work undertaken by the Ministry to provide this level of advice, and the implications of the recommended policy direction. We congratulate the Ministry on reaching this significant milestone and what it might mean for biodiversity policy in New Zealand.

At Whakatāne District Council, we share and welcome the urgent call for biodiversity action across all levels of government in Aotearoa New Zealand. We recognise our own role in showing leadership and doing our part to protect our biodiversity through the unique relationships we have with our communities, stakeholders, and iwi partners. We believe local government has an important part to play in collectively protecting our environments and helping nature and people thrive. Accordingly, a biodiversity credit system may do just that, in incentivising landowners to earn credits for their positive actions in contributing towards our ecosystem.

In the Whakatāne District, we are fortunate to have significant areas of indigenous biodiversity which contribute to making our District one of the most beautiful in the mōtū. Our District encompasses a large land and ocean area that includes extensive river systems and native forests. As with many other parts of Aotearoa New Zealand, we wish to protect and restore indigenous biodiversity. Across the Whakatāne District, we have a total of 141 Significant Natural Areas (SNAs) in line with a principle of the Resource Management Act 1991 (RMA) that recognises that the protection of areas of significant vegetation and significant habitats of indigenous fauna is a matter of national importance.

Maintaining indigenous biodiversity comes at a cost with funding being a barrier to implementation. A biodiversity credit system could resolve this issue and support the National Policy Statement – Indigenous Biodiversity (NPS-IB) by providing funding for landowners to undertake projects on SNAs that support and conserve nature. A biodiversity credit system can also support the NPS-IB by providing a platform for offsetting. Under the NPS-IB if an activity has adverse effects on an SNA that cannot be avoided, biodiversity offsetting or biodiversity compensation needs to be provided. A biodiversity credit system could be the mechanism that is used for offsetting with compensation used to fund conservation efforts in other SNAs. A biodiversity credit system has the potential to play an important role in conserving indigenous biodiversity by providing a platform to fund conservation and helping achieve the purpose of the NPS-IB. We therefore support the system in line with the NPS-IB.

The government needs to be aware of statutory land right obligations. Land that is shared with government Iwi and Hapū must be eligible for the BCS. This land tenure often misses out on traditional government funding prioritisation.

A mixed model approach must be enabled through the system. Landowners committed to improving nature must be able to continue complementary activities on the land that allow them to generate income. It is unsustainable to expect land owners to undertake intergenerational conservation and lock in the land on income from the biodiversity credit system.

We need to ensure the system is created in a way that prioritises biodiversity. It is important to us to pursue equitable outcomes and opportunities whereby the system is not just limited to private landowners, but it is an accessible and fair system. Thus, whilst providing incentives for funding, we believe there should be regulatory and compliance measures which provide safeguards around such measures.

We also believe the system should be contextualised locally which would then feed into a national framework. This requires local knowledge of our ecosystem, which reinforces the need to work closely with local iwi and hapū, landholders and communities. Similarly, we believe we should not look at our diverse species in silo, rather using a systems approach, and appreciates how all species interact. To this end, we think it is important to look at all types of species such as coastal, marine, and terrestrial.

We share and emphasise the Manatū Mō Te Taiao objective of protecting and restoring our unique biodiversity in Aotearoa New Zealand. With the proposed biodiversity credit system in mind, we need to ensure the equity of people, while also ensuring the resilience of our communities. A well implemented biodiversity credit system should work for te taiao, work for all people and deliver the outcomes it was created to achieve.

We are aware that achieving this system requires a collaborative approach, and we are eager to work closely with Manatū Mō Te Taiao and central government to develop an effective biodiversity system for our District should the opportunity arise. We offer our local knowledge networks and expertise to inform the final advice going to government and look forward to regularly contributing towards the Manatū Mō Te Taiao processes and milestones.

Nāku noa, nā
Dr Victor Luca
MAYOR - Koromatua