Nga Motu marine reserve society

P.O. Box 1029
New Plymouth

Rosemary Miller
Policy Officer
Taranaki Regional Council
P. Bag 713
Stratford

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Comments on TRC Biodiversity Strategy, Draft

1. *Confirm that your organisation's involvement in biodiversity management in Taranaki is accurate*: 4.7.2 Please add: "…has now been gazetted by the Minister of Conservation."

2. *Accuracy of Section 4.9, Table 2.* (p 37): Advocacy: add Nga Motu Marine Reserve Society and, after "Act for biodiversity values" add ".., including marine biodiversity"

3. *Council's top priorities:*
   We believe there is a significant omission here and suggest that an explanation is required to assist the Council deliver its statutory obligations. This could be included as a preface to the Top Priorities which clarifies the relationship between Council's legal responsibilities under the RMA and biodiversity work as outlined in this strategy document: "Assessment of environmental effects is a requirement under the RMA, and therefore the impacts of developments on biodiversity must be considered as part of the resource consent process. To facilitate this, Council needs accurate and specific information on existing biodiversity."

   Make No. 4, information management, priority No. 1.

   Of equal importance is No. 3, improved coordination of biodiversity work, so we would suggest this becomes priority No. 2.

   Current No. 1: The definition of Key Native Ecosystems needs to be expanded to include coastal and marine. We suggest this becomes priority No. 3.

   Current No. 2: This also needs to include coastal and marine biodiversity. It is also vital that the land-sea linkage is included as there is a danger that sensitive ecosystems could otherwise be ignored. Explanation under No 6 below.

4. *Commenting on proposed objectives and actions, particularly section 6.4*
   Section 6.4:
   Action 84 (p62): after "on private land" add "and in coastal and marine areas"
   Action 94 (p63) after "on their land" add "or coastal and marine areas"
   Action 97 (p64) Integrate this with T.E.R:R.A.I.N, the Puke Ariki community partnership fund project funded by Ministry for Internal Affairs.

6.4.5: Actions for Iconic Projects.

Add "Sea to mountain corridor of indigenous habitat along a river (e.g. could be based on 'filling in' between existing riparian plantings)
Action 109 (p65). Include marine pests.

6.4.7 Advocacy

Action 115. Strongly agree with most appropriate scale
Action 116. Delete "subject to community views." Actions 110-118 do not have this condition. Community feedback is implicit in advocacy.
Add new action: Advocate for the protection of existing biodiversity by making comprehensive information on this available to developers, landowners, consultants etc. For example, information collected for assessments of environmental effects under the RMA could be incorporated into council databases. (This also overlaps with 6.5 'Information management', but it needs to be included here because providing sound information is clearly an advocacy role).

5. *Areas for agencies and community groups to work together*:
The community is a rich source of biodiversity information. There are systems available for co-ordinating public participation and gathering such information which are both user friendly and scientifically robust, through use of filters etc. We recommend Council investigate such systems. At a national level, Council needs a way to access geo-spatial information e.g. from the NABIS database, and NZBRN database. Currently there seems to be no easy interface between all these systems which makes accessing information much more difficult than it needs to be. (Section 6.5)

6. *Any other matters of relevance*:
The focus of the document is land based. We ask that coastal and marine biodiversity be included overtly in all key areas of the strategy. In areas where Council has no capacity to act in coastal and marine matters, there need to be strategies for advocacy and co-operative relationships with other agencies e.g. Ministry of Fisheries and DoC.

NB Section 2.4 points out that "as much as 80% of native biodiversity is found in the sea." Land and sea are linked from a biodiversity point of view, for example: run-off from land impacts on marine ecosystems; penguins feed in the sea and nest and moult on land.

The land/sea interface is also rich from a biodiversity perspective. In some cases it can be a biodiversity hotspot. Currently it is poorly protected, e.g. there are a large number of threatened coastal plants.

Coastal habitat needs to be protected proactively in view of

a) coastal subdivisions
b) planned extensions to the NPDC walkway to the north and south.

Threats include pets, other pest animals, pest plants and habitat destruction.

Opportunities include working collaboratively with local communities, landowners and NPDC planning section.

In terms of marine biodiversity, we lack much basic information. The strategy is a fundamental document for Council so the full range of biodiversity must be included.

The relationship of the strategy to the TRC Coastal Plan also needs to be made explicit.

Section 3.4 Coastal and marine biodiversity
First paragraph: after "a marine protected area" include "two marine reserves,"
The 2 large biogeographic regions as included are not particularly helpful. It would be more useful to set up an appraisal system based on local substrates, locally monitored physical environmental

factors and local human impacts, as this would give the necessary fine scale information to use as a management tool.

The Society already has information available on species diversity and range that can be shared.

3.4.3. Tapuae Marine Reserve can now be included here as it has been gazetted. Also, add here "Biodiversity will now be able to be compared between areas of similar habitat that are totally protected from fishing and areas that are not protected. Council could set up a monitoring programme to gather such information, perhaps in conjunction with DoC."

3.4.4 Add a reference to Little Blue Penguins. E.g. "Little Blue Penguins also occur where habitat is suitable for nesting."

3.5 At the end of the 2nd paragraph. Also note the possible impacts on marine biodiversity e.g. "increased likelihood of invasive species which prefer warmer sea temperatures".

5.2.3 Table 4. Under Coastal and Marine: "Advocating for marine protection", add "including marine reserves"

Section 6.2. Key Native Ecosystems. A clear system for identifying KNEs is needed. This needs to explicitly include coastal and marine ecosystems.

An information system such as MARXAN could be used to help assess regionally significant sites and assist with managing them. MARXAN provides a framework for gathering and analysing data on habitat, species range, current pressures on the environment and current environmental protection.

Section 6.5. Information management
Refer to the previous comments under #5 and #6. Robust information gathering underpins the success of the Biodiversity Strategy, and information cycle.

As a community group we ask the TRC to value community participation in biodiversity data gathering, by using Public Participatory Systems and using metadata to identify sources of information. The submission process will be facilitated if community contributions can be elicited and verified, allowing evaluation. For example Maui Dolphin Protection Plan suffered through incomplete information in the official databases, and required a time extension to examine incoming data. Many resource consent applications will be improved if the applicant knows what species to look for and how to mitigate for these.

The Society appreciates the opportunity to explain our position, and we look forward to a time when comprehensive biodiversity records underpin all resource management decisions.

With regards from

Anne Scott
Chair
Nga Motu Marine Reserve Society