



**Submission
on
Draft Wellington Conservation Management Strategy**

3 April 2017

Environment Network Manawatu Inc. (ENM) is a coordinating organisation and network that encourages and fosters Manawatū-based environmental initiatives. ENM was formed in 2000 (and incorporated in 2001) with the aim of improving communication, coordination, and cooperation between environmental community groups. ENM currently has almost fifty diverse environmental member groups, active in areas ranging from biodiversity to sustainable living and amenity. Our constitutional purposes are to:

1. coordinate and communicate the efforts of the member groups to enhance the local environment;
2. act as a central point of access to environmental information;
3. advocate for ecological sustainability and matters of agreed environmental significance;
4. work in partnership with hapū and iwi to recognise kaitiakitanga and environmental aims and objectives in common;
5. liaise with similar organisations elsewhere in New Zealand and around the world as appropriate, to source and share ideas for environmental projects and issues.

This submission has been prepared by members of the Network's Biodiversity Cluster which is a collective of the groups within the Network that have a particular focus on protecting, restoring and enhancing the region's indigenous biodiversity. A draft was circulated to all member groups for feedback before finalising. This submission is written on behalf of full member groups only (excluding affiliate members).

ENM regards the Conservation Management Strategy as profoundly important for the future well-being of the Wellington region, and in particular, the part of the region in which ENM and its member groups are located. It is increasingly clear that our indigenous biodiversity is central to our prosperity. The ecosystem services that it provides underpin our economic and social well-being. Unfortunately, as a recently published report by Lincoln University highlights, there is quite a discrepancy between public perception of New Zealand's biodiversity wellbeing and the fact that New Zealand has one of the highest numbers of endangered (900) and declining (2800) species in the world.

We thank the Department for this opportunity to shape how the Wellington CMS region is managed over the next 10 years. ENM has a specific interest in how the draft CMS supports the conservation values associated with the Central Spine Place, Manawatū-Rangitikei Place and Coastal Dunes Place. First, we make some general comments and then we make some more detailed comments on specific concerns.

Part 1

1. ENM supports the aspirational vision “New Zealand is the greatest living space on earth” but wishes to emphasise the importance of ambitious yet achievable outcomes for the ten-year term of the CMS that will demonstrate substantial progress towards that vision and towards addressing the challenges identified on page 6 of the Foreword. In other words, this CMS must make a substantial contribution to:
 - stopping the continuing loss of indigenous biodiversity
 - reducing the impact of invasive pests
 - improving fresh water quality; and
 - reducing visitor impacts on indigenous biodiversity

in the area covered by the CMS.

2. ENM supports the statement (page 8) that “Conservation protects New Zealand’s natural capital.” Given the importance of the conservation estate to our economic and social well-being, ENM considers that the draft CMS does not contain sufficiently robust policies or sufficiently ambitious milestones.
3. The Department has statutory obligations to manage New Zealand’s conservation estate and wildlife. Yet, it appears that the Department intends to rely heavily on community groups, PSGEs, and tangata whenua to restore, protect and enhance our indigenous flora and fauna species and the ecosystems of which they are a part. We see the goodwill and desire of communities to step up; and we submit that central government needs to provide the resources to help the Department to enable community groups to operate successfully.
4. ENM supports the policies and objectives in 3.3 but has doubts about whether the milestones are given sufficient urgency and priority. It will be important for the CMS to incorporate feedback from the Department’s Treaty partners.
5. ENM supports the emphasis on developing mountains-to-sea corridors but considers that DOC’s ‘Place’ approach is somewhat at odds with a catchment approach. ENM would like to see much stronger policies and objectives to connect the various ‘Places’ into a cohesive network of corridors and centres that will allow biodiversity to regenerate. It will be necessary for the Department to make connections across several ‘Places’. The importance of the Forest Parks means that there must be sustained and intensive pest management led by the Department.
6. ENM supports the policies and objectives in 4.1 (Natural Values) to prevent further biodiversity loss. Milestone 4.1.3.9 refers to partners leading restoration projects. We appreciate the opportunities partnerships present. At the same time, we would not want to see any further reductions in funding for the Department and its efforts of achieving sustained action to eradicate pests and maintain pest-free sites. ENM considers that Milestone 4.1.3.11 is vague and the degree/quantum of improvement needs to be more precisely stated.
7. As part of preventing further biodiversity loss, there needs to be specific recognition of the necessity for “Soil biodiversity conservation” in all relevant sections of the CMS. Soil

biodiversity/belowground biodiversity is seriously threatened with spread of invasive pest plants, as well as extensive use of inorganic fertilisers/agrochemicals in the Manawatū/Rangitikei River catchment.

8. In the context of biodiversity we submit that there is also a need to better protect whitebait and longfin eel populations.
9. On page 24 there is a description of the Manawatū landform that refers to the “dissected uplands west of the Ruahine and Tararua Ranges”. This does not appear to recognise that the Manawatū River flows for a considerable distance on the eastern side of the Ruahine Ranges.
10. ENM considers that opportunities for Recreation in the conservation estate (and public access generally) need to be seen as vital for engaging the public in conservation. Therefore, the level of resourcing for the policies and objectives needs to be improved. ENM is concerned that the draft CMS refers to prioritisation of management effort to ensure that recreation provision is achievable within the Department’s available resources. ENM and many of its member groups value the recreational opportunities associated with Te Araroa Trail, the Ruahine and Tararua Forest Parks, the Manawatū Gorge Scenic Reserve and other public conservation land (PCL) in the Manawatū. The CMS milestones need to drive resourcing decisions and take into account trends in demand for outdoor recreation particularly in PCL. Tourism around outdoor recreation is of growing economic importance for the region and therefore more resources will be needed to ensure the Department can fulfil its statutory obligations. In addition, there needs to be adequate monitoring of the impacts of increasing numbers of visitors.
11. ENM recommends that the CMS also note the need, where monitoring shows adverse effects on indigenous flora and fauna and their ecosystems (e.g. fresh water), for limits to the numbers of visitors including in Icon, Gateway and Local Treasure destinations. Therefore Milestones 4.3.3.1 and 4.3.3.2 need to be amended with the addition of words (after 15% and 20% respectively) “where monitoring shows that there are no adverse effects of visitors on indigenous flora and fauna”. The same applies to Milestones 4.3.3.8, 4.3.3.9, 4.3.3.15 and 4.3.3.16.
12. ENM strongly supports Milestone 4.3.3.3 but recommends that this be given greater urgency by being brought forward. Much of this information is already known to the Department or readily available from community groups such as tramping and walking groups. The same applies to Milestones 4.3.3.6 and 4.3.3.7.
13. ENM recommends that greater urgency be given to Milestones 4.3.3.10, 4.3.3.12, 4.3.3.13, 4.3.3.14, 4.3.3.17, 4.3.3.19 and 4.3.3.20 given the importance of visitors to the regional economy.
14. ENM recognises the contribution that indigenous biodiversity plays in providing richer recreational opportunities both on and off public conservation lands and water. However, ENM also acknowledges the impacts of human activity on indigenous biodiversity which has an intrinsic value quite apart from its ecosystem services. Although this intrinsic value may be difficult to measure, increasingly it is becoming possible to measure it. Greater

awareness is needed of the shortcomings of conventional valuation methods that do not measure this value fully.

15. To further reinforce concerns expressed earlier, ENM is uncomfortable with the wording on page 39 in the Engagement section which refers to community groups being encouraged to initiate and lead a range of important conservation programmes. If community groups like many of ENM's member groups are expected to initiate and lead such conservation programmes there needs to be adequate resourcing from the Department. This requires a significant increase in funds from Vote: Conservation for community conservation. At present, our member groups are dependent on small grants from regional councils and territorial authorities and fund-raising from private and philanthropic sources which are often not stable or sufficient for the extensive effort involved in ecological restoration.
16. Section 4.4 Engagement with community, needs to be amended to recognise that, while the value of community participation is important (see page 39), community groups should not be assumed to be the same as other 'conservation partners' that are more resourced. Partnership implies 'equality' in a relationship. Yet, this kind of equality is not found in the Department's relationship with many community groups as the Department has statutory power and very different resources.
17. Paragraph 4.4.2.1 refers to "enduring relationships" which we consider to be a more appropriate term for describing the relationship between the Department and community conservation groups and stakeholders. ENM would like to note that the ongoing success of these relationships depends on a certain level of continuity. A high level of staff turnover or worse reduction in staff levels in the Department puts a high burden on community groups and other stakeholders.
18. ENM questions how realistic Paragraph 4.4.2.7 (Enter into formal management agreements with established community groups to undertake conservation work) is and how this will be resourced.
19. Milestones 4.4.3.1-4.4.3.9 need to be substantially revised taking into account our comments here.

Part 2

20. Central Spine Place

Earlier concerns about possible lack of connections between 'Places' in the draft Wellington CMS notwithstanding, ENM supports recognition of the distinctive landscapes and ecosystems of the Central Spine. We wish to note the importance of the Ruahine and Tararua Forest Parks and the Manawatu Gorge Scenic Reserve. There are relatively few bush remnants remaining in the central North Island, making the conservation of what does remain particularly vital. This region includes some of the best examples of lowland podocarp forest remaining in New Zealand. The Gorge also has the possibility of increasing public interest in conservation with positive spin-offs for generations. ENM recommends there should be specific policies

and milestones for Te Apiti/Manawatū Gorge. In the draft, there is a reference to the Manawatū Gorge only under 'outcomes' (page 68).

21. Manawatū-Rangitikei Place

Earlier concerns about possible lack of connections between 'Places' in the draft Wellington CMS notwithstanding, ENM supports recognition of the distinctive landscapes and ecosystems encompassed by the catchments of the Manawatū and Rangitikei Rivers. In the time since the last CMS for this part of the Wellington Conservation Board area, the community's awareness and appreciation of their importance has grown exponentially. As the CMS notes, the benefits of pest management are evident in healthy ecosystems and thriving threatened species populations.

ENM endorses the acknowledgement that it is through recognition of the values that exist and protection of existing indigenous flora and fauna on PCL and private land, and then building on this, that overall biodiversity and conservation values will be increased. Therefore, ENM strongly supports initiatives to protect and enhance remnant reserves such as the Scientific and Scenic reserves and to increase QEII covenants.

ENM supports Policies 7.3.2.1-7.3.2.4 but would like greater urgency in the milestones 7.3.2.5-7.3.2.16. While ENM supports the Rangitikei River Global GeoPark concept in principle, we would only support such an investigation if the Department receives additional, dedicated funding from Central Government to do so. In the case that such funding eventuates, we recommend that the CMS milestone is reworded to include the Manawatū catchment. It is our understanding that this catchment would potentially also qualify for GeoPark Status.

In addition, ENM recommends that policies and milestones be developed that recognise the importance of the Manawatū River as a source-to-sea corridor. There is an urgent need for more intensive plant pest management in large sections of the riparian strip including the City Reach.

ENM is pleased to see that the draft CMS notes that Old Man's Beard is an issue within the Rangitikei-Manawatū Place and it is a priority for the Department to control this with tangata whenua, the public and others, and prevent its expansion into the Ruahine Ranges. Again, this needs to be given greater urgency.

22. Coastal Dunes Place – Manawatū Estuary

On page 223 the significance of the Manawatū Estuary is described as regional. Yet, it is a RAMSAR site for migrating birds and hence is of international significance.

Concluding Comments

We wish to be heard in support of our submission.

Yours sincerely

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