Submission Number 31

Canterbury Botanical Society
P.O. Box 8212
Christchurch 8440

info@canterburybotanicalsociety.org.nz

Submitted to
Selwyn District Council
56 Tennyson Street, Rolleston
PO Box 90, Rolleston 7643
Email: yoursay@selwyn.govt.nz

13 December, 2023

Canterbury Botanical Society Submission on

The Draft Selwyn District Council Biodiversity Strategy 2023

Who we are and what we have witnessed.

1 The Canterbury Botanical Society can trace its beginnings back to the Canterbury Native Flora Society which was founded in 1953. It aims to promote an interest in the study of botany, especially that of Aotearoa New Zealand and particularly the native flora of Canterbury. The Society currently has 156 members.

2 The Society has four main areas of interest, knowledge and advocacy:

- Dryland Canterbury plains, including associated spring wetlands and braided rivers.
- Eastern South Island limestone flora.
- Canterbury wetlands.
- Canterbury montane basin tussocklands, shrublands, wetlands, and ephemeral tarns.

It is good to see that all of these ecosystems are highlighted in the Draft Selwyn Biodiversity Strategy.

3 Each spring the Society hosts a field day to a Canterbury Low Plains dryland remnant area to maintain the knowledge of the plants of these now extremely rare ecosystems.

4 In the past 30 years Society members have witnessed the loss of dryland plants, the extinction of several populations of dryland species, degradation of all highlighted ecosystem types, particularly through irrigation associated with changing farming practices, the invasion and expansion of exotic weeds, the encroachment on and “taming” of braided rivers, and the increase in the threat rank and number of Threatened and At-Risk plant species in the Eastern South Island.

5 We believe that almost all New Zealanders understand the value of forests and large, obvious wetlands. In Canterbury, biodiversity loss is mainly in non-forest ecosystems; lands easily developed for farming and urban expansion.

6 A new revision of the conservation status of New Zealand indigenous vascular plants published by the Department of Conservation in 2018 (de Lange et al) made note of a continuing worrying trend of noticeable deterioration in populations of plants of eastern South Island drylands.

7 In 2018 The Department of Conservation released a report on the calcicolous vascular flora of New Zealand. It catalogued the perilous state of the Eastern South Island limestone flora the (Science for Conservation report 331). 29% of the 152 limestone plant species are ranked as "Threatened – Nationally Critical", the highest threat rank. Only 5% (eight species) are considered not threatened. The report confirms that small areas of limestone outcrops are home to tiny populations of distinct plant species. Of the 41 taxa in the South Marlborough–North Canterbury limestone 21, or 68%, of the limestone plant entities are ranked as "Data-deficient" or "Threatened". It is even worse for the Mid-South Canterbury–North Otago limestone flora, where 24 out of 29 taxa, or 83%, are "Data-deficient" or "Threatened". These naturally small, isolated populations have been taken to the brink of extinction by the loss of their original vegetation structure, land clearance, invasive weeds and disappearance of their lizard and bird seed-dispersers.

8 The Society now looks to Draft Selwyn Biodiversity Strategy to see what remedies and relief can be brought to the difficult issue of the protection and restoration of the threatened species and ecosystems that lie within Selwyn District

SDC Biodiversity Strategy Goals & The Canterbury Botanical Society's Response

1. Work in partnership with manawhenua, landowners, and other stakeholders to protect, enhance, maintain, and restore indigenous biodiversity, mahinga kai, taonga species, and culturally and historically significant sites.

We support the goal of protecting/restoring the indigenous biodiversity that remains in the Selwyn District. While building biodiversity through activities such as plantings is laudable, the unique character and richness of existing sites of indigenous biodiversity is difficult or impossible to reproduce, and the protection of these sites must be the priority.

While we support working in partnership with stakeholders, this partnership must be accompanied where necessary by the consistent and effective enforcement of those rules and regulations which exist to protect indigenous biodiversity. Particularly those that relate to the clearance of indigenous vegetation. It is only through consistency that the enforcement of these rules and regulations becomes *expected*. And only when expected are they given their full effect.

2. Identify the state of indigenous biodiversity within Selwyn and develop appropriate responses in accordance with our statutory responsibilities to halt the decline of our flora and fauna.

We support the goal of identifying the state of indigenous biodiversity. Much of the disappearance of Canterbury's indigenous biodiversity has occurred unnoticed and unrecorded. Before any sensible plans can be formed for the protection of Selwyn District's indigenous biodiversity, we must have a clear understanding of what remains. Furthermore, this cannot be a one-off effort. Monitoring must be on-going so that trends can be identified, and the relationship between indigenous biodiversity, land-use, regulations, and restoration works can be understood. A clear understanding of the state of Selwyn's indigenous biodiversity and its trajectories is important in a number of ways. It can be used to inform where and how resources are invested, to measure the efficacy of restoration works, and to better make the case when lobbying other bodies (DOC, ECAN, MFE, MPI) for resources and support.

3. Support actions by landowners and our community to protect and restore indigenous biodiversity and enhance public awareness of our natural environment.

We particularly support improved public awareness of indigenous biodiversity. Very little of the Canterbury Plains' indigenous vegetation remains - and most of Selwyn District's population lives on the plains. There is scant opportunity for the public to get to know and appreciate the district's indigenous biodiversity. An informed public that cares for its district's indigenous biodiversity is more likely to support investments in that indigenous biodiversity.

Involving the public in community restoration works is an excellent way to get them invested in indigenous biodiversity. However, this should be seen as supplementary to core restoration work, not a substitute for it. Serious restoration work occurs over large areas and over long periods of time. It requires the skills and knowledge of professionals and significant commitment and investment. It occurs at a scale that is beyond what can reasonably be expected of community groups, and if too much is left to these groups it is unlikely to succeed.

4. Encourage and increase the integration of indigenous species in modified environments, including urban spaces, lifestyle blocks, and managed waterways

We support the integration of indigenous species in modified environments, particularly as it supports Goal 3. However, the inclusion of indigenous species in modified environments must not be mistaken as a replacement or offset for the degradation or loss of indigenous biodiversity in natural sites. On the other hand, these modified environments will in some ways need to be managed like natural sites. For example, there is the risk that drains and retention basins planted in native species will come to support many of the same weeds that afflict natural wetlands, and in doing so become seed sources of these weeds, which have the potential to then spread into natural sites. The Selwyn District Council must be prepared to properly resource the management of these modified environments.

SDC Biodiversity Strategy *Opportunities for Better Biodiversity Management* (Section 5.0) & The Canterbury Botanical Society's Response

Note that where appropriate the subsections have been grouped and responded to as such.

5.1 - Leadership and Partnership

5.2 - Coordination and Integration

5.3 - Attitudes, Awareness and Incentives

We support education, advocacy, technical advice, and relationship-building with landowners and other stakeholders as means to support the protection of indigenous biodiversity. However, these approaches must be built on a foundation of regulatory enforcement. Consistent enforcement creates clarity, and avoids situations where land-owners have developed the expectation that they will "get away" with regulatory breaches. If landowners expect enforcement they are less likely to breach regulations in the first instance and experience relationship-damaging conflict with the SDC.

We support relationship-building and coordination with "iwi, community organisations, environmental NGOs, central and local government agencies, businesses, industry, landowners / managers, and individuals." This is important for coordinated protection and enhancement of the district's indigenous biodiversity. For example, controlling a weed on council property without coordinating the control of that same weed on the neighbouring private properties is a recipe for frustration and potential failure.

5.4 - Community Empowerment and Relationship-Building

See paragraph two of our response to Goal 3.

5.5 - Monitoring

See our response to Goal 2. In addition to that response, we support the formation of a Biodiversity Monitoring Programme, particularly if this will result in consistent, coordinated and ongoing monitoring.

SDC Biodiversity Strategy *Targets and Actions for the Selwyn District* (Section 6.0) & The Canterbury Botanical Society's Response

Note that where appropriate the subsections have been grouped and responded to as such.

Note also, that the numbering of the sections and subsections of these goal targets is inconsistent and a bit confusing. We have followed them as they are.

Note also, while the Canterbury Botanical Society supports the SDC meeting its obligations to iwi under Te Tiriti o Waitangi and the Local Government ACt (2002), it is beyond our expertise to make comment on how these obligations are being met. Subsections that deal only with the council's obligations to iwi are left without response.

GOAL 1 TARGETS

1.2 We support the identification and protection of the most threatened and taonga species across the district as a priority. However, there should also be recognition that there are sites that as a whole are worthy of protection as a priority, even when they lack one of the threatened and taonga species. In other words, these sites may be worth more than the sum of their parts.

We fully support the annual monitoring of threatened and taonga species and would encourage the same frequency for ecologically significant sites.

1.3 We support the goal of gaining public support for restoration works. We particularly support the recognition that biodiversity does not exist only in reserves and similar public land, but can be found on private land across rural and urban areas, and is just as deserving of protection there as elsewhere.

GOAL 2 TARGETS

1.1 & 1.2 See our responses to Goal 2 and Subsection 5.5

1.4 We support the goal of no net loss of "indigenous flora and fauna, habitats, and ecosystems within Selwyn." However, *net* loss leaves the possibility of off-setting the loss of indigenous biodiversity at one site with the "creation" of biodiversity at another. We make the point again that the unique character and diversity of an existing site of indigenous biodiversity cannot be built from scratch at another. No net loss of biodiversity should mean no more loss at all of existing sites of indigenous biodiversity, in whole or part.

1.5 We support the goal of increased restoration work in Selwyn. However, these restoration efforts should focus first and foremost on the protection of existing sites of indigenous biodiversity through activities such as fencing and pest control. The creation of new sites of indigenous biodiversity, particularly through plantings, should be a distant second as a priority.

GOAL 3 TARGETS

1.1 See paragraph one of our response to Goal 3.

1.2 We support the goal of building relationships with local education providers. SDC is unusually well-served with education-providers and research bodies (Lincoln University, Manaaki Whenua). This puts it in a good position to make evidence-based decisions about its efforts to protect and restore indigenous biodiversity.

1.3 See paragraph two of our response to subsection 5.3.

GOAL 4 TARGETS

4.1 See paragraph one of our response to Goal 3.

4.2 We support the "integration of indigenous biodiversity into our rural and urban land use systems, including Council managed reserves and public spaces." This target will support Goal 4, Target 1.1. It could also address the problem seen in local governments of different branches of the same local government body working at cross purposes. For example, the parks division of a council may plant exotic trees which have the potential to become pest species, which then need to be controlled by those parts of the council responsible for protecting and enhancing indigenous biodiversity. It is far better to have all branches of the council paddling the waka in the same direction.

4.3 We support this goal.

Canterbury Botanical Society's Response Summarised with Some Additional Points

- The four goals in the draft strategy are heartening ones. Summarised as protecting and enhancing indigenous biodiversity, monitoring it, and improving the public's understanding and appreciation of it - these are to be commended.
- While relationship-building with stakeholders is important - this must be accompanied by regulatory enforcement. We cannot afford any more clearance of indigenous vegetation in Selwyn.
- Expressing an intention to restore indigenous biodiversity is good, of course. This intention must be matched by funding commensurate to the scale of this task.
- Restoration work should be focussed primarily on the protection and restoration of existing sites. Far too much money is spent in conservation on planting new sites of indigenous biodiversity. Planting is expensive, it results in sites that are less diverse than existing sites, and its success (such as it is) is hit and miss.
- Rigorous and consistent monitoring of biodiversity is crucial to understanding the current state of indigenous biodiversity in Selwyn, identifying trends, and measuring the efficacy of restoration works.
- Significant investments in wilding pine control have been made by central government in recent years, including the 2020 announcement of $100m to be spent over four years. However, with difficult economic times and a change in government, future funding should be considered uncertain. SDC must be prepared to fund wilding pine control in the coming years.
- Related to the above. Thousands of hectares of marginal land across Aotearoa are being planted in pines for carbon farming. This promises to be a disaster for the wilding pine problem, with these pine carbon farms producing enormous amounts of seed. It is also a missed opportunity - it would be far better if this marginal land was guided into native forest, ideally using a minimum-interference approach.
- The Christchurch City Council has prepared a draft *Christchurch City Council Operational Pest Plant Management Plan*. It has been designed to complement and put into effect the relevant goals and obligations in the *Canterbury Regional Pest Management Plan 2018-2038 (RPMP)* and the *CCC Biodiversity Strategy 2008-2035.* This plan has specific goals and indicators that are to be reported on regularly. Crucially, it identifies priority weed species and council assets (land) which should be prioritised for control. A plan of this type should be developed by SDC to support the effective control of pest plants within the district.

Finally, the Canterbury Botanical Society is very supportive of the development of the SDC Biodiversity Strategy, and broadly supportive of its goals and strategies. Congratulations to those who have worked towards the production of the draft.

Many thanks for considering this submission.

Joe Potter Butler

Canterbury Botanical Society Committee-Member and Submissions Coordinator