

From: [Jo Burton](#)
To: [Rosemary Feary](#); [Cathy McNab](#); [Sam Anwar](#)
Subject: FW: Feedback on proposed change to the National Policy Statement for Indigenous Biodiversity
Date: Friday, 22 March 2024 1:29:07 pm
Attachments: [image001.jpg](#)
[image002.png](#)

See below – this is really helpful.

From: Chris Keeling <chris@carina.co.nz>
Sent: Friday, March 22, 2024 1:21 PM
To: Hayden Johnston <Hayden.Johnston@mfe.govt.nz>; Jo Burton <Jo.Burton@mfe.govt.nz>
Cc: Ali Meade (Ali.Meade@es.govt.nz) <Ali.Meade@es.govt.nz>; Patrick Whaley <Patrick.Whaley@waikatoregion.govt.nz>; Chris Ingle <Chris.Ingle@boprc.govt.nz>; Alan Johnson <alan.johnson@marlborough.govt.nz>; Al Cross <Al.Cross@teurukahika.govt.nz>
Subject: Feedback on proposed change to the National Policy Statement for Indigenous Biodiversity

MFE CYBER SECURITY WARNING

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Kia ora Hayden and Jo,

Thanks again to you and the team for the sessions yesterday. It was really useful to have the space to get together and ask some questions.

Timeframes for feedback are too short for a formal regional sector response. Please take this as informal feedback on behalf of the regional sector Biomanagers Special Interest Group.

- **There are risks for territorial and unitary authorities** – Existing RMA S6 requirements remain and it will be down to councils to determine how to fulfil them. The proposed amendments will impact on territorial authority functions, but also regional councils where they are involved in coordinating the delivery of the SNA programme and/or have alignment in regional policy statements or plans. There will be timing challenges for TAs and unitary authorities who are in the process of identifying SNAs now or going through plan change processes. We need longer to understand and unpick this as a broader local government sector.
- **We need certainty quickly** – It sounds like there will be a level of uncertainty for some time yet. Specifics (and timeframes) of the SNA amendment are loose at this stage and the scope for broader review is yet to be determined. Coupled with signalled RM system changes in several years, councils may find it challenging to prioritise investment into implementation. This has already played out around council tables on Long Term Planning due to Government's signalled NPSIB change in late 2023.
- **Councils are being put in a challenging legal situation** - This could put councils in an undesirable situation: a requirement to implement but without the certainty to prioritise investment for implementation. Councils will need time to work through what this means for them and how they intend to proceed.
- **As a result, this will impact Aotearoa's biodiversity** – The NPSIB was intended to raise the bar for indigenous biodiversity management, but the proposed change and corresponding uncertainty will likely result in a return to status quo for council statutory frameworks and programmes. We are unlikely to see any change to the current levels of

indigenous biodiversity loss as a result.

- **We want to be involved in all review processes** – We are very keen to take any opportunity to assist with reviews, scope-development and provision of advice. Please feel free to reach out and we'll help where we can.

If you want clarification on any of the above, please let me know.

Ngā mihi,

Chris

(on behalf of Biomanagers SIG)



Chris Keeling

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