

25 March 2024

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Ministry for the Environment

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Tēnā koe Hayden,

### **Proposed suspension of identification of new areas of native biodiversity**

We write in relation to the Government's proposal to suspend identification of new areas of native biodiversity via changes to the National Policy Statement for Indigenous Biodiversity (**NPS IB**).

Since the proposal was provided to EDS (6 working days ago), Hon. Chris Bishop has announced that a Resource Management Amendment Bill will be introduced in May of this year to "cease the implementation of new Significant Natural Areas for three years to enable a thorough review of their operation."<sup>1</sup>

Accordingly, it appears that the Government now intends to legislate the suspension of mapping of Significant Natural Areas (**SNAs**), rather than amend the NPS IB through the normal process as first proposed (or at least as signalled to stakeholders).

We strongly oppose the proposal (in whatever form it might ultimately take):

1. First, the timeframe for feedback on the proposal is completely insufficient, inadequate and unreasonable. Offering us 1 week to provide feedback is an insult to our extensive expertise on biodiversity and the NPS IB.
2. Second, the information provided on the proposal is completely insufficient (and, as per Minister Bishop's comments, wrong anyway). The Minister cannot seriously expect that we would waste our time providing feedback on such an important matter based on a 1 page information sheet.
3. Third, the Minister's subsequent comments demonstrate that the consultation is not genuine anyway, as the proposal presented to stakeholders does not even reflect the Government's intended action.
4. Fourth, the changes set out are significant as they seek to suspend the requirement for Councils to map SNAs. This is contrary to section 6(c) of the Resource Management Act 1991 (RMA) and Council functions under s31(1)(b)(iii) of the RMA.

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<sup>1</sup> <https://www.beehive.govt.nz/speech/speech-new-zealand-planning-institute>

5. Fifth, the NPS IB brings certainty to landowners as it ensures that Councils are identifying SNAs in a consistent way based on significance criteria that was collaboratively designed and developed by independent ecological experts. Delaying the requirement to map SNAs will only result in a continuation of patchy and inconsistent identification. That is no good for landowners or indigenous biodiversity.
6. Finally, New Zealand is in the midst of a biodiversity crisis. The statistics are clear and do not bear repeating. Delaying the identification of native biodiversity, which would have allowed it to be appropriately managed, is reprehensible.

We urge the Ministry to impress upon the Minister the risks of proceeding and to recommend that the proposal be discontinued.

Ngā mihi

A handwritten signature in blue ink, appearing to read 'Gary Taylor'.

**Gary Taylor CNZM QSO**  
**Chief Executive**  
**Environmental Defence Society**