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emailed to: biodiversitystrategy@doc.govt.nz

SUBMISSION TO DEPARTMENT OF CONSERVATION ON ACTION FOR NATURE: IMPLEMENTING NEW ZEALAND'S BIODIVERSITY STRATEGY 2025-2030 DISCUSSION DOCUMENT

Thank you for the opportunity to present this submission on the Department of Conservation's Action for Nature: Implementing New Zealand's Biodiversity Strategy 2025-2030 Discussion Document (the document).

People are drawn to the Queenstown Lakes District (QLD, the district) to live, visit and recreate because of its spectacular natural environments. The natural ecosystems and biodiversity around the district not only have intrinsic value but are also critical for community wellbeing and to the local economy. Well-functioning ecosystems also regulate the environment providing resilience to the impacts of climate change.

Queenstown Lakes District Council (QLDC) recently released its draft Climate and Biodiversity Plan 2025-2028 for public feedback. The plan outlines how to address the climate change and biodiversity crises, by placing Te Taiao (the natural world) at the centre and "accelerating transformation through partnership".

QLDC is generally supportive of the themes and actions outlined in the discussion document, however, it makes the following key recommendations for consideration:

- a. Clarify the scope and intent of this consultation, particularly in the broader context of changes in national direction and regulatory reform that will affect biodiversity outcomes.
- b. Clarify the role of central government and territorial authorities under each of the themes and actions.
- c. Engage with Mana Whenua, territorial authorities and other local entities in developing national biodiversity priorities.
- d. Ensure external funding, revenue and support is in addition to, not in place of current central government funding and support.
- e. Recognise the broader context of environmental threats (e.g. climate change, habitat loss and degradation) and regulatory reforms (i.e., resource management reform) that have the potential to affect biodiversity outcomes.

QLDC would not like to be heard at any hearings that result from this consultation process.

Thank you again for the opportunity to comment.

Yours sincerely,



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1.0 Context of the Action for Nature: Implementing New Zealand's Biodiversity Strategy 2025-2030 in relation to QLDC

- 1.1 The environment in the QLD is of critical importance, renowned for its alpine landscapes and diverse ecosystems. Biodiversity plays a vital role in maintaining healthy ecosystems and the natural landscapes which make QLD one of New Zealand's premier visitor destinations. However, with increasing pressures from development, tourism, and climate change, protecting the unique biodiversity and landscapes of the district has become critical.
- 1.2 In 2019, Queenstown Lakes District Council (QLDC) declared a climate and ecological emergency and released its first Climate Action Plan. In 2022, QLDC released its second action plan, the Climate and Biodiversity Plan 2022-2025, which highlighted the importance of addressing the dual crises together. QLDC recently released its draft Climate and Biodiversity Plan 2025-2028 for public feedback, which places Te Taiao (the natural world) at the centre of the plan and focuses on "accelerating transformation through partnership".
- 1.3 The QLD has a very active and engaged community, passionate about preserving and protecting the outstanding environment. This was also evident in the Queenstown Lakes' Destination Management Plan: Travel to a Thriving Future¹, and the hard mahi being undertaken by many organisations across the district ².

2.0 Clarify intent of engagement and the roles and responsibilities for both central government and territorial authorities

- 2.1 It is understood that the document supports consultation on the next implementation plan for Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy 2020 (ANZBS), with feedback specifically sought on the proposed critical actions between now and 2030. However, the scope and intent of the engagement is unclear. For example, with prioritisation of critical actions, the status of the remaining actions outlined in the 2022 Implementation Plan is ambiguous and needs to be addressed.
- 2.2 The document must clarify the roles and responsibilities for central government, regional and territorial authorities in supporting the critical actions across each of the themes and recognise the importance of collaboration.

3.0 Theme 1: QLDC recommends that biodiversity priorities are agreed through engagement with Mana Whenua, territorial authorities and other local entities.

- 3.1 QLDC is supportive of agreed biodiversity priorities driving investment and action. However, in developing "a national picture of our most important biodiversity values" it is essential that Mana Whenua, territorial authorities and other local entities have a role to play to ensure local knowledge and matters of significance are reflected in the national context. Additionally, the focus of biodiversity action is narrow. Whilst there is mention of protecting and restoring species and habitats, there is no discussion of ecosystem or landscape-scale protection and restoration.

¹ <https://www.regenerativetourism.co.nz/the-plan>

² <https://climateaction.qldc.govt.nz/our-partners/>

4.0 Theme 2: QLDC seeks assurance that external funding is in addition to, and not in place of, current central government funding and support.

- 4.1 QLDC is generally supportive of increasing external funding, revenue and support to deliver biodiversity action, provided this is in addition to existing funding and actions, including maintenance of central government funding. Actions under this theme should clarify the role of central government, for example in the regulation of any funding systems to ensure they are robust and avoid adverse unintended consequences.

5.0 Theme 3: QLDC recommends an evidence and knowledge-based approach that incorporates multiple knowledge systems and does not reduce the ambition of the implementation plan.

- 5.1 QLDC is broadly supportive of the actions under this theme, provided it does not reduce the ambition outlined in the current Implementation Plan. To adequately address the ecological and climate crises, the full spectrum of knowledge systems needs to be used together to guide decision making for biodiversity. QLDC has taken a partnership approach using “braided knowledge” in the development of its draft 2025-2028 Climate & Biodiversity Plan³ (pp. 10-11). The “braided knowledge” approach interweaves scientific, local and mātauranga knowledge equally, aiming to form a deeper and more holistic understanding of problems and identify collaborative, effective solutions.

6.0 Theme 4: QLDC recommends that capability and support to address the biodiversity crisis is considered in the broader context of environmental threats.

- 6.1 QLDC agrees with increasing capability and support to address the biodiversity crisis and reflects this through a commitment to supporting the growth of the environmental services sector as part of the draft Climate & Biodiversity Plan 2025-2028. However, the biodiversity crisis and climate crisis need to be addressed together in an integrated manner with cross-agency support and collaboration as required. Managing risks to biodiversity should not focus only on biosecurity risks, but also threats from climate change, habitat loss and degradation through development, pollution and exploitation. Additionally, the implementation plan needs to be set in the broader context of the National Direction and Resource Management Act 1991 reforms that have the potential to affect biodiversity outcomes.

³ <https://letstalk.qldc.govt.nz/climate-and-biodiversity-plan-2025-2028>