

Draft Threatened Species Strategy: Summary of Submissions

Context and purpose

The draft Threatened Species Strategy was released for public consultation on the 10th of May 2017. The consultation period closed on Monday 31st July 2017. Analysis and consideration of the submission points received is being used to inform decisions about proposed changes to the draft strategy to improve its clarity, accuracy, effectiveness and broad support. This document provides an overview of the submissions received, and summary of the significant submission themes and some additional data of interest.

Overview of submissions received

192 submissions were received. Thirty percent of submitters were explicitly supportive of the strategy, and only 8 percent opposed to its establishment. About a third of submitters expressed concern about DOC's level of resourcing to successfully implement the strategy, with the majority of these requesting more Government funding for conservation. The following tables summarise the broad submitter types, the significant themes made by submitters and additional general data.

Submitter Type	Number	Submitter Type	Number
Government-related (e.g. conservation boards)	5	Conservation group - national	16
Local government (regional and city councils)	11	Conservation group - local	21
Iwi (e.g. trusts, rūnangas)	10	Captive management institutions	6
Commercial business	6	Individuals	108
Academic/Research organisations	9	TOTAL	192

Summary of significant submission themes

Submission theme	Submission points
1. <i>Strategy vision</i>	<ul style="list-style-type: none"> • The vision lacks ambition, is too restrictive and is uninspiring. • It should be inclusive of all threatened and at-risk species. • It relies too heavily on Predator Free NZ 2050 and therefore lacks focus across the full suite of pressures. • The vision is not clearly stated and is hard to find. It should be a succinct statement about the desired future state. • There is not a clear or logical link between the strategy vision, goals and actions. • A wide range of alternative vision statements and amendments were suggested by submitters. Some suggested modelling a vision after the Parliamentary Commissioner for the Environment's vision – <i>The restoration of abundant, resilient and diverse species and habitats across their natural range</i> – or reflecting Aichi targets¹, the NZ Biodiversity Strategy² or the Biodiversity Action Plan 2016-2020. • It is biased towards terrestrial species and not inclusive of the full range of possible contributors who would help fulfil implementation of the strategy. • It is vague about the inclusion of iwi beliefs and traditions. • It should honour or align with New Zealand's international commitments.
2. <i>Strategy goals</i>	<ul style="list-style-type: none"> • Many suggestions for additional goals were provided. Significant omissions include goals to align directly with the strategy themes and vision. For example, there is no goal focused on managing ecosystems at scale to protect and recover species, nor a goal about working in partnership and empowering others to contribute to species conservation.

¹ Aichi Biodiversity Target 12: By 2020 the extinction of known threatened species has been prevented and their conservation status, particularly of those most in decline, has been improved and sustained (for all targets refer to: <https://www.cbd.int/sp/targets/>).

² NZ Biodiversity Strategy – Goal Three: Halt the decline in New Zealand's indigenous biodiversity – Maintain and restore viable populations of all indigenous species and subspecies across their natural range and maintain their genetic diversity (for all goals and sub-goals refer to: <http://www.doc.govt.nz/nature/biodiversity/nz-biodiversity-strategy-and-action-plan/new-zealand-biodiversity-strategy-2000-2020/part-two-a-vision-goals-and-principles/>).

	<ul style="list-style-type: none">• Many suggestions were made for changes to existing goals, to make them clearer, broaden their scope, focus on threatened species, and improve their specificity.• Many submitters felt the goals are not ambitious and will not prevent more species from becoming threatened.• A few submitters felt the goals are challenging to achieve.• The goals are too vague and cannot be measured (e.g. Goals 3 and 4).• There are insufficient goals to explain what is required to advance threatened species conservation.• Concerns were raised about the nature of the goals, their lack of connection to the strategy themes and actions, their timeframes and the lack of any stated accountability.• The goals should provide specific measurable outcomes instead of details about the actions needed.• DOC should consider using the Aichi Biodiversity Targets and the goals in the original NZ Biodiversity Strategy.• Suggestions were made to use improvements in species threat status as part of the measures for some goals.• The goals do not align with other national biodiversity strategies (e.g. the NZ Biodiversity Action Plan 2016-2020).• Goal 1 (Manage 500 species for protection by 2025 and 600 species for protection by 2030):<ul style="list-style-type: none">○ The goal is not measurable; it only commits to ‘managing’ species and not outcomes for species.○ Many submitters wanted the number of species to be increased.• Goal 3 (Integrate Te Ao Māori and mātauranga Māori into species recovery programmes by 2025):<ul style="list-style-type: none">○ There is no explanation of how the goal will be given meaningful and practical effect.○ The timeframe to achieve the goal is unreasonably long.○ Iwi must be supported to determine the nature of this commitment and how elements of Te Ao Māori and mātauranga Māori are integrated.○ Integration of Te Ao Māori and mātauranga Māori should be an underpinning ethos across all aspects of conservation management instead of a separate goal.
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	<ul style="list-style-type: none"> • Goal 4 (Support research, particularly through the National Science Challenges, that helps us to better understand data deficient species): <ul style="list-style-type: none"> ○ Clarification is needed on what is meant by Data Deficient in the goal and how it relates to Data Deficient species as described in the main text of the strategy. ○ The National Science Challenges are not aimed at threatened species management and have a focus on enhancing NZ's economic growth, which can conflict with threatened species management. They are not aimed at accumulating data necessary to address Data Deficient species. ○ Research should not be limited to Data Deficient species only. It should be inclusive of all the research needed to understand reasons for decline and how and where to manage threatened and at-risk species.
3. <i>Strategy actions</i>	<ul style="list-style-type: none"> • Many additional actions were provided by submitters. Typical of these were: <ul style="list-style-type: none"> ○ Introduce regulation to achieve zero by-catch of threatened species in fisheries. ○ Include an all-of-government approach to threatened species recovery. ○ Identify opportunities to purchase or covenant habitats of threatened species. ○ Expand the War on Weeds to a broader range of environmental weeds, including lupins, broom and willows. ○ Develop education and advocacy programmes to inform the community about how they can help. ○ Develop a detailed action plan which is regularly reviewed and updated to deliver the strategy. • Many amendments to the existing actions were recommended by submitters. These included changes to the wording, scope and intent of the actions. Examples include: <ul style="list-style-type: none"> ○ Broaden Action 3 to include additional ex-situ approaches for securing threatened plants. ○ Amend Action 7 to focus on developing priority areas for threatened species protection on private land. ○ Expand Action 8 beyond Data Deficient species only, and focus on at least 1000 species. ○ Amend Action 9 so that national recovery planning is not only fit-for-purpose but timely and implemented to support threatened species recovery.

	<ul style="list-style-type: none"> ○ Reconsider the ‘comprehensive’ intent of Action 10, which may be impractical and unnecessary. • Many queries about the intent and clarity of the actions were received, suggesting that improvements are required about how they are expressed and defined (e.g. Why does seed banking feature as a priority action when the strategy acknowledges that it is not a panacea and requires further research? Also, what is the purpose of Action 10?). • Actions are too Government-focused. Include actions that inform and enable others to contribute and promote a ‘whole of nation approach’ (including iwi, business, councils, and land owners). • More detail and clarity about the specific tasks is required, including the task owner, accountability, timeframes, milestones, key performance indicators, measures of success, and reporting of progress. • The relationship between the actions and the strategy vision and goals is not apparent. Each goal needs associated actions to reach that goal (refer to the NZ Biodiversity Strategy 2000). • Inappropriate to endorse Predator Free NZ 2050 as the highest priority action. It focuses on only one threat factor: predation, and does not address all predators (such as mice, hedgehogs, cats, ferret and weasels). Address full suite of predators and browsers. • The actions should encompass the full suite of significant threats to species (such as herbivores, weeds, pathogens, and invasive invertebrates), including those affecting freshwater and marine species. • Vital concepts of habitat restoration and ecosystem management are not reflected in the actions, yet are strategy themes. • Highest priority actions should focus on implementing DOC’s ecosystem and species-integrated prioritisation systems. • Actions are collectively insufficient to halt the decline of threatened species and prevent more from becoming threatened. • ‘Top 10 actions’ implies there are more actions – but these are not mentioned?
4. <i>Characterisation of the value and state of species</i>	<ul style="list-style-type: none"> • Understates the dire state of threatened and at-risk species. • Could be clearer about the pressures facing threatened and at-risk species. • Biased towards terrestrial pressures and predators.

	<ul style="list-style-type: none"> • Under-represents invertebrates, freshwater and marine threatened species. • Does not adequately describe the importance of taonga species to iwi or acknowledge the cultural use of some species.
5. <i>Strategy tools</i>	<ul style="list-style-type: none"> • Many suggestions were provided for amendments to the wording and content of the ‘right tools for the job’ section. In most cases, suggestions were to alter or increase the emphasis on specific tools, issues, and contributors in the conservation community (e.g. both support and opposition to the use of captive management as a tool). • Additional tools suggested (these can also be interpreted as potential actions for the strategy): <ul style="list-style-type: none"> ○ Use of digital technology to inform and engage with people. ○ Stronger regulation to broadly protect species and their habitats (e.g. legislation to protect plants, regulation of the commercial harvesting of threatened and at-risk species). ○ More effective enforcement of regulations. ○ Effective partnerships with Regional Councils. ○ Application of economic tools such as Natural Capital accounting. ○ Tourism levies to help fund conservation. ○ Support and opposition to greater use and emphasis on captive management approaches. ○ Effective and humane predator control, and effective weed control. ○ Effective monitoring programmes. ○ A ‘whole-of-government’ approach. ○ Spatial modelling to under-pin large-scale pest management or eradication. ○ Application of the Crown tenure review process to help secure high-country species and their habitats. ○ Research to address knowledge gaps about threatened species biology and their recovery. ○ Research and development of new pest management tools. ○ Reference to pest control of the full suite of predators and other pests. ○ Broader focus on weeds (War on Weeds does not cover many weeds that create direct pressures on threatened species).

	<ul style="list-style-type: none"> ○ Development of a translocation policy. ○ Genetic approaches for pest control. ○ Increased use of citizen science. ○ Reduction of government administrative barriers to conservation work (e.g. translocation application process).
6. <i>Strategy focus / themes</i>	<ul style="list-style-type: none"> ● It is difficult to relate the themes to the goals and actions. ● Significant omissions: Managing genetic diversity and genetic techniques for future management of species. ● The theme of ‘focusing beyond public conservation land’ should include greater mention of the role of Regional Councils, address extractive, agriculture and development impacts, and be inclusive of marine environments. ● Require a theme focused on developing an ‘all-of-government’ response for threatened species conservation. ● Many suggestions were provided for amendments to the existing themes to provide more detail, acknowledge specific points or emphasise issues. ● Commentary provided by many submitters on the nature and challenges encountered in relation to progressing themes.
7. <i>150 priority species</i>	<ul style="list-style-type: none"> ● Range of views about the number of species identified in the list of 150 priority species. The majority of those commenting on the priority list suggested that an insufficient number of species are listed. ● Many suggestions for specific species to be included in the list (e.g. orange-fronted parakeet, pateke). ● Inadequate representation of marine and freshwater species, plants, shorebirds, sea birds and invertebrates (e.g. too many snails, while other invertebrate groups are under-represented). ● No fungi or bryophytes included. ● Algorithm for selecting 100 priority species should be independently peer-reviewed. ● Include the Te Reo names of the priority species listed. ● Some submitters queried the rationale for the selection of the 50 ‘notable’ species.

	<ul style="list-style-type: none"> • Support and opposition to the selection of species based on social value (notable species). • Too many notable species compared to objectively selected species. • Selection criteria and process needs to be more clearly explained. • Concerns that the algorithm may be over-representing some taxa (e.g. lepidium). • Concerns that the priority list includes some at-risk and Conservation Dependant species. • Suggestions that adjustments to the algorithm may be required. • Opposition to the selection of priority species from only those which are currently managed. • Concern that the selection may not include species managed by others. • Relationship between the 150 priority species and the 500 and 600 species referred to in Goal 1 is not clear. • Opposition to a prioritisation approach – that all species in need should be included. • Identify priority species at a local level to guide contributions to their conservation. • Priority species should also include Data Deficient species.
8. <i>Suggested changes and additions to other content</i>	<ul style="list-style-type: none"> • There were many suggestions for detailed changes. Suggestions ranged from minor edits, alternative wording, additional information, and changes to the intent of some elements. • Additional content for specific groups of species or themes, for example, plant-focused case studies. • Include information about the effects of climate change on threatened species. • Include a declaration that DOC is the provider of national leadership in conservation science and management. • Outline how the strategy will influence the Predator Free NZ 2050 initiative to benefit threatened species. • Describe how DOC will provide oversight to ensure the successful implementation of the strategy. • Amend the text to describe the role of iwi as kaitiaki in terms of a responsibility (it is more than just guardianship).

	<ul style="list-style-type: none"> • Include an outline of the monitoring and reporting framework necessary to assess achievement of the vision and goals. • Include constructive opportunities for iwi and hapu to be involved with recovery and restoration work. • Acknowledge the impact of commercial harvest on some threatened species (e.g. whitebait, long-finned eel). • Acknowledge the effect of the extractive industry, agricultural intensification and other development projects. • Refer to the full range of conservation partners and stakeholders consistently throughout the document.
9. <i>Clarity of the strategy</i>	<ul style="list-style-type: none"> • The number of case studies (Spotlights) is excessive and detracts from presenting a cohesive strategy. • The structure of the document is confusing, difficult to work with, and not logical. The <i>strategy themes</i> should be presented before the <i>foundations for recovery</i>. • Suggestions to improve clarity include providing a summary at the end of each section; more clearly defining the terms and ‘jargon’ used (e.g. definition of species and ‘enhanced national population’); including a graphic showing the relationship between the components of the strategy; providing an appendix with responses to frequently asked questions; and including further information on how actions will be progressed. • The relationship of the strategy to other national strategies and plans, such as the Biodiversity Strategy and the Biodiversity Action plan 2016-2020, is not clear. • Greater clarity and consistency is required throughout the document on who is intended to use the strategy. • Several existing initiatives are presented without explanation as to how they combine to advance species conservation. • There is no information about how the strategy will be implemented. • It is not clear how Regional Councils can contribute to the implementation of the strategy.
10. <i>Elements of significant concern</i>	<ul style="list-style-type: none"> • Insufficient resources are available to achieve the strategy’s goals. • The strategy does not strive to halt the decline of all threatened and at-risk species. • The strategy does not strive to prevent the extinction of species.

	<ul style="list-style-type: none"> • The strategy weakens existing Government commitments such as the Aichi Biodiversity Target: '<i>By 2020, the extinction of known threatened species has been prevented</i>'. • There is insufficient focus on threatened invertebrates, plants and marine species and their environments. • There is acknowledgement of only some contributors to conservation, without mentioning others (e.g. focus on the National Science Challenges, without acknowledging other research providers). • The strategy does not have statutory status. This is needed for other parties to have regard to the strategy. • The goals and actions do not explicitly connect with the stated outcomes for iwi to have opportunities to fulfil their kaitiaki role. • DOC's species prioritisation approach is too strongly influenced by economic models (i.e. cost is a driver). • Relies on implementation and growth of existing initiatives that do not address the full range of pressures affecting species. • Broad partnership approach is reducing Crown's responsibility and accountability for delivering conservation outcomes. • An over-emphasis on predators and their management (actions), and only limited focus on other pressures including the commercial harvest of species and by-catch of threatened species, agricultural intensification and climate change. • Lack of attention and actions to address the full range of pressures including mice, hedgehogs, cats, ferrets and weasels. • Lack of attention on weeds outside of the Dirty Dozen. • Greater focus on the protection of habitats is required.
11. <i>Corrections of factually incorrect information</i>	<ul style="list-style-type: none"> • Specific data and information presented in the strategy is either incorrect, misleading or requires checking. • Information presented in some graphics is presented in an unclear or misleading way. • Errors that DOC is already aware of and undertaking work to correct were identified in some submissions (for example, the presentation of data on numbers of threatened species (page 12), and out-of-date information on myrtle rust). • Some submitters suggested that it is incorrect to state that Predator Free NZ 2050 is 'the springboard for protecting

	threatened species', and that it should be considered a contributor to threatened species conservation, rather than the full response necessary.
<i>12. Engagement with iwi</i>	<ul style="list-style-type: none"> • There has not been adequate engagement with iwi during the development of the draft strategy. • Further consultation is necessary to ensure the rights of iwi granted under Treaty Settlement Claims are addressed. • The development process demonstrates to iwi the lack of significant improvement from DOC to work in a genuine partnership with iwi, as per Section 4 of the Conservation Act. • Consultation with iwi is required during consideration and decision-making on the use of bio-control agents and seed banking. • The strategy does not acknowledge DOC's obligations under Treaty Settlement Claims, or that several iwi are yet to settle with the Crown. • The grouping of iwi together with other partners devalues the paramount partnership that iwi have with the Crown under the Treaty. Iwi should be described as the principal partner with the Crown.
<i>13. Concerns about resources</i>	<ul style="list-style-type: none"> • The resources required for successful implementation of the strategy are not identified. • Implementation will be hamstrung by a lack of resources to carry out the actions, and therefore the successful achievement of the vision and goals will be compromised. • DOC is not adequately resourced to effectively conserve threatened species or to implement the strategy. • The scope and ambition of the strategy appears to be deliberately constrained by current DOC resourcing levels.