

<p><u>Question</u></p>	<p><u>Response</u></p> <p>Notes:</p> <p>NPSIB: National Policy Statement for Indigenous Biodiversity</p> <p>NPSFM: National Policy Statement for Freshwater Management</p> <p>SNA: Significant Natural Area</p>
<p>1. Do you have any feedback on the workability of provision 1.3: Application?</p>	<p>(2) (b) although the specific highly mobile fauna identified in the proposed NPS-IB include some species that are found on the Chatham Islands (e.g. NZ shore plover, red-billed gull and others), other species that are particular to the Islands have not been included. We have included a list of species that should be included later in this submission.</p> <p>(2) (c) It will be important that the resource consent requirements for restoring wetlands align with the requirements under the NES-F and the NPS-FM. Also, the definition of wetland needs to be consistent across all national direction.</p>
<p>2. Do you have any feedback on the workability of provision 1.5: (2) Te Rito o te Harakeke?</p>	
<p>3. Do you have any feedback on the workability of provision 1.5: (3) Maintenance of indigenous biodiversity?</p>	<p>It will be important that there is clarity about which protections apply only to SNAs and which apply to all indigenous biodiversity.</p>

<p>4. Do you have any feedback on the workability of provision 1.5: (4) Effects management hierarchy?</p>	
<p>5. Do you have any feedback on the workability of provision 1.6: Interpretation?</p>	<p>“Threatened, At Risk, and At Risk (Declining)”</p> <ul style="list-style-type: none"> • Not all ‘at risk’ taxa are included in the table of species, rather only those ranked ‘At Risk, Declining’, or ‘At Risk, Recovering’ with the qualifier (CD). The definition should cover the same classes of vulnerability as the table. • There is no definition covering how the specified highly mobile fauna included in the table in the appendix have been chosen. Are they all fauna that are highly mobile (also not defined) and meet the vulnerability criteria? • The threat rankings quoted in the table are now out of date – they’re the 2016 threat rankings, whereas we should now all be using the threat rankings that were published in late 2021. This does have a meaningful impact on the species that are included in Appendix 2. For example, the spotted shag is omitted from the Appendix as it was ranked as “Not Threatened” in 2016, however in late 2021 it was upgraded to “Nationally Vulnerable”, so should now be included in the Appendix.
<p>6. Do you have any feedback on the workability of provision 2.1: Objective?</p>	
<p>7. Do you have any feedback on the workability of provision 2.2: Policies?</p>	

8. Do you have any feedback on the workability of provision 3.2: Te Rito o te Harakeke?	
9. Do you have any feedback on the workability of provision 3.3: Tangata whenua as kaitiaki?	
10. Do you have any feedback on the workability of provision 3.4: Integrated approach?	
11. Do you have any feedback on the workability of provision 3.5: Social, economic, and cultural wellbeing?	
12. Do you have any feedback on the workability of provision 3.6: Resilience to climate change?	It is difficult on the Chatham Islands to provide for natural adjustments of habitats as the climate changes. There is not the same ability as on mainland New Zealand for species to move to higher latitudes or altitudes to escape increasing temperatures.
13. Do you have any feedback on the workability of provision 3.7: Precautionary approach?	
14. Do you have any feedback on the workability of provision 3.8: Assessing areas that qualify as significant natural areas?	<p>The Chatham Islands Resource Management Document identifies Areas of Significant Natural Values. These include areas of significant indigenous vegetation and habitats of fauna, and outstanding features and landscapes. The areas generally consist of land managed by the Department of Conservation and Council, private lands protected by conservation covenants/kawenata and Nga Whenua Rahui and areas in the coastal marine area and areas on private land which the landowner has agreed to.</p> <p>The criteria used to identify those areas are not all the same as those listed in the draft NPS-IB. Reassessment of the land on the Islands would be an onerous task with a great deal of inaccessible and</p>

	remote land needing to be assessed. It would also be costly to carry out such an assessment as it would be necessary to engage a suitably qualified ecologist from off the Islands. It is likely that reassessment would not result in a major gain for indigenous biodiversity on the Islands as identified areas are already protected. Reassessment could also cause tensions with landowners that could lead to a loss of goodwill in protecting indigenous biodiversity.
15. Do you have any feedback on the workability of provision 3.9: Identifying SNAs in district plans?	Any associated plan change requirements will rely on Central Government funding.
16. Do you have any feedback on the workability of provision 3.10: Managing adverse effects on SNAs of new subdivision, use, and development?	Any associated plan change requirements will rely on Central Government funding.
17. Do you have any feedback on the workability of provision 3.11: Exceptions to clause 3.10?	
18. Do you have any feedback on the workability of provision 3.12: SNAs on Māori lands?	
19. Do you have any feedback on the workability of provision 3.13: Geothermal SNAs?	
20. Do you have any feedback on the workability of provision 3.14: Plantation forests with SNAs?	There is little plantation forestry on the Islands at present. Although this could change in the future, it is unlikely that it would contain an SNA.

<p>21. Do you have any feedback on the workability of provision 3.15: Existing activities affecting SNAs?</p>	<p>The existing activities identified in the current Resource Management Document are the disposal of fish factory wastes and septic sludge and effluent. These are categorised as permitted activities.</p> <p>Any associated plan change requirements will rely on Central Government funding.</p>
<p>22. Do you have any feedback on the workability of provision 3.16: Maintaining indigenous biodiversity outside SNAs?</p>	<p>Any associated plan change requirements will rely on Central Government funding.</p>
<p>23. Do you have any feedback on the workability of provision 3.17: Maintenance of improved pasture?</p>	
<p>24. Do you have any feedback on the workability of provision 3.18: Māori lands?</p>	<p>Any associated plan change requirements will rely on Central Government funding.</p> <p>The Council do not wish to comment on provisions that should be discussed directly with tāngata whenua.</p>
<p>25. Do you have any feedback on the workability of provision 3.19: Identified taonga?</p>	<p>There are no taonga (as defined in the draft NPS-IB) identified in the current Resource Management Document. These will need to be assessed for the Islands. This is likely to be a costly exercise and will need to rely on Central government funding.</p> <p>Any associated plan change requirements will also rely on Central Government funding.</p> <p>These proposed provisions should be discussed directly with tāngata whenua.</p>
<p>26. Do you have any feedback on the workability of provision 3.20: Specified highly mobile fauna?</p>	<p>The assessment and recording of areas that are highly mobile fauna areas will need to be carried out on the Islands. This is likely to be an expensive exercise as expertise will need to come from off island. Any costs will need to be covered by central Government funding.</p> <p>The list of highly mobile fauna identified in appendix 2 does not include species that are particular to the Chatham islands and should be amended so that all relevant species are included.</p>

	Any associated plan change requirements will rely on Central Government funding.
27. Do you have any feedback on the workability of provision 3.21: Restoration?	Any associated plan change requirements will rely on Central Government funding. Any associated incentives for restoration in priority areas will also rely on central Government funding.
28. Do you have any feedback on the workability of provision 3.22: Increasing indigenous vegetation cover?	Assessment of the percentage of indigenous cover, especially in outlying, inaccessible parts of the islands will be a difficult and expensive exercise. This process will need to rely on Central Government funding. Any associated plan change requirements will rely on Central Government funding.
29. Do you have any feedback on the workability of provision 3.23: Regional biodiversity strategies?	The preparation of a Regional Biodiversity Strategy for the Chatham islands will be a costly exercise and will need to rely on significant Central Government funding. Any associated plan change requirements will rely on Central Government funding.
30. Do you have any feedback on the workability of provision 3.24: Information requirements?	Any associated plan change requirements will rely on Central Government funding. It is extremely difficult for resource consent applicants to access advice from an ecologist on the Islands. There should be central government funding set aside to assist consent applicants in this process.
31. Do you have any feedback on the workability of provision 3.25: Monitoring by regional councils?	Development of a monitoring plan will require central government funding, as will carrying out monitoring under the plan.
32. Do you have any feedback on the workability of the provisions under Part 4: Timing?	The ability for the Chatham Islands Council to meet the timing requirements listed will depend on the amount and timing of Central Government funding. Activities that require ecological assessments by a qualified ecologist will be dependent on the availability of such people to work on the Islands.

33. Do you have any feedback on the workability of provision A: Representativeness criterion?									
34. Do you have any feedback on the workability of provision B: Diversity and pattern criterion?									
35. Do you have any feedback on the workability of provision C: Rarity and distinctiveness criterion?									
36. Do you have any feedback on the workability of provision D: Ecological context criterion?									
37. Are there any species which should or shouldn't be on the specified highly mobile fauna list?	<p>Interestingly, Appendix 2 of the NPS-IB does include one species that's largely restricted to the Chatham Islands (shore plover) and several other species (e.g. banded dotterel and red-billed gull) that breed on both the Chatham Island and mainland NZ.</p> <p>Given that there is no definition of "highly mobile" in the draft, we have used the definition from the previous NPS-IB to form the following list of Chatham Island bird taxa that should be included in Appendix Two of the NPS-IB:</p> <table border="1" data-bbox="658 1102 2029 1326"> <thead> <tr> <th data-bbox="658 1102 898 1217">Common name</th> <th data-bbox="898 1102 1167 1217">Scientific name</th> <th data-bbox="1167 1102 1377 1217">2021 NZTCS ranking</th> <th data-bbox="1377 1102 2029 1217">Comments</th> </tr> </thead> <tbody> <tr> <td data-bbox="658 1217 898 1326">Chatham Island shag</td> <td data-bbox="898 1217 1167 1326"><i>Leucocarbo onslowi</i></td> <td data-bbox="1167 1217 1377 1326">Nationally Vulnerable</td> <td data-bbox="1377 1217 2029 1326">Not currently included in Appendix 2 of the NPS-IB</td> </tr> </tbody> </table>	Common name	Scientific name	2021 NZTCS ranking	Comments	Chatham Island shag	<i>Leucocarbo onslowi</i>	Nationally Vulnerable	Not currently included in Appendix 2 of the NPS-IB
Common name	Scientific name	2021 NZTCS ranking	Comments						
Chatham Island shag	<i>Leucocarbo onslowi</i>	Nationally Vulnerable	Not currently included in Appendix 2 of the NPS-IB						

	Pitt Island Shag	<i>Phalacrocorax featherstoni</i>	Nationally Vulnerable	Not currently included in Appendix 2 of the NPS-IB
	Chatham Island oystercatcher	<i>Haematopus chathamensis</i>	Nationally Critical	Not currently included in Appendix 2 of the NPS-IB
	NZ shore plover	<i>Thinornis novaeseelandiae</i>	Nationally Critical	This species is already listed in Appendix 2 of the NPS-IB, presumably because it has been translocated to a number of inshore islands on the NZ mainland.
	Subantarctic skua	<i>Stercorarius antarcticus lonnbergi</i>	Nationally Vulnerable	Not currently included in Appendix 2 of the NPS-IB
	Red-billed gull	<i>Larus novaehollandiae scopulinus</i>	At Risk, Declining	This species is already listed in Appendix 2 of the NPS-IB
	Southern white-fronted tern	<i>Sterna striata aucklandorna</i>	At Risk, Declining	Not currently included in Appendix 2 of the NPS-IB. Note: the white-fronted tern (<i>S. s. striata</i>) is included in the appendix, however the 2021 Conservation Status of NZ birds recognises that the white-fronted terns present on the Chatham and Auckland Islands are a separate subspecies (southern white fronted tern; <i>S. s. aucklandorna</i>), so should be listed as a separate taxon in Appendix 2.

	Lesser knot	<i>Calidris canutus</i>	At Risk, Declining	This species is already listed in Appendix 2 of the NPS-IB
	Eastern bar-tailed godwit	<i>Limosa lapponica baueri</i>	At Risk, Declining	This species is already listed in Appendix 2 of the NPS-IB
	Grey duck	<i>Anas superciliosa</i>	Nationally Vulnerable	This species is already listed in Appendix 2 of the NPS-IB
	Spotless crake	<i>Zapornia tabuensis</i>	At Risk, Declining	This species is already listed in Appendix 2 of the NPS-IB
	Marsh crake	<i>Zapornia pusilla</i>	At Risk, Declining	This species is already listed in Appendix 2 of the NPS-IB
	Banded dotterel	<i>Charadrius bicinctus</i>	At Risk, Declining	This species is already listed in Appendix 2 of the NPS-IB
	Parea	<i>Hemiphaga chathamensis</i>	Nationally Vulnerable	Not currently included in Appendix 2 of the NPS-IB
	Chatham Island tui	<i>Prosthemadera novaeseelandiae chathamensis</i>	Nationally Vulnerable	Not currently included in Appendix 2 of the NPS-IB
<p>We have excluded any species considered to be vagrant (irregular visitors) to the Chatham Islands, because vagrants to the NZ mainland have clearly also been excluded from Appendix 2 of the NPS-IB. Unlike the vagrants to mainland NZ though, some of the vagrants to the Chatham Islands are ranked as either Nationally Threatened or At Risk (e.g. wrybill, Caspian tern), however, it would be more consistent to exclude these species from Appendix 2, rather than include them on the basis of a “technicality”.</p>				

	<p>We have also excluded all pelagic seabirds (albatrosses, petrels, shearwaters, penguins), despite the fact that they obviously breed on land. Again, we've done this to be consistent with the existing version of Appendix 2.</p> <p>We also haven't included any parakeet species in the list, as none of the mainland parakeet species are included in Appendix 2, this is rather surprising as all parakeet species would seem to be highly mobile.</p>
<p>38. Do you have any feedback on the workability of Appendix 3: Principles for biodiversity offsetting?</p>	
<p>39. Do you have any feedback on the workability of Appendix 4: Principles for biodiversity compensation?</p>	
<p>40. Do you have any feedback on the workability of Appendix 5: Regional biodiversity strategies?</p>	<p>The development of a Regional Biodiversity Strategy for the Chatham Islands is a considerable undertaking. It will require significant Central Government funding and will rely on the availability of mainland New Zealand ecologists and other specialists to carry out the work.</p>
<p>Any general feedback on the consultation</p>	