



TO THE

DEPARTMENT OF CONSERVATION

ON THE

**New Zealand Biodiversity
Strategy Discussion Document –
Te Koiroa o Te Koioroa**

BY

Beef + Lamb New Zealand Ltd

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BY FARMERS. FOR FARMERS

SUBMISSION TO THE DEPARTMENT OF CONSERVATION ON TE KOIROA O TE KOIOROA

Submission on the New Zealand Biodiversity Discussion Document

Te Koiroa o Te Koiroa

To: NZBS Consultation Team
The Department of Conservation
Wellington

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The specific provisions of the proposal that Beef + Lamb NZ Ltd submission relates to and the decisions it seeks from the Department of Conservation are as detailed on the following pages. The outcomes sought and the wording used is as a suggestion only, where a suggestion is proposed it is with the intention of 'or words to that effect'. The outcomes sought may require consequential changes to the Strategy or restructuring of the Strategy, or parts thereof, to give effect to the recommended amendments.

Beef + Lamb New Zealand Ltd wishes to be heard in support of its submission.

INTRODUCTION

1. Beef + Lamb New Zealand (B+LNZ) is an industry-good body funded under the Commodity Levies Act through a levy paid by producers on all cattle and sheep slaughtered in New Zealand. Its vision is 'Profitable farmers, thriving farming communities, valued by all New Zealanders'.
2. B+LNZ supports the general intent and purpose of the proposed New Zealand Biodiversity Strategy in providing a framework by which New Zealand can develop and implement clear and meaningful biodiversity policies that contribute to safeguarding the future of our indigenous species and in meeting our commitments to the international Convention of Biological Diversity ('CBD').
3. As an organisation and as a sector we welcome opportunities to build partnerships with the Department of Conservation, and other crown entities, along with our wider communities, to collaboratively work to protect and strengthen the health and resilience of our communities and our environment.
4. As kaitiaki of their land, sheep and beef farmers are host to 2.8million¹ hectares of native biodiversity, including 1.4million hectares of native forest. This is the second largest holding of native forest and native biodiversity – bettered only by the Crown estate. In some regions, such as the East Coast, there is more native biodiversity on sheep and beef farm land than in the Crown estate. Added to this is an estimated 180,000 hectares of forestry blocks. This means that the sheep and beef sector is particularly invested in indigenous biodiversity; and this is why B+LNZ has, through its Environment Strategy, committed to leading the sector towards its vision of sheep and beef farms providing habitats that support biodiversity and in protecting our native species.



Figure 1: B+LNZ's Environment Strategy Pillars

¹ Norton D., Pannell J., 2018. Desk-top assessment of native vegetation on New Zealand sheep and beef farms.

5. The sheep and beef sector takes an integrated and holistic view to the sustainable management of natural resources. The sector is actively seeking solutions that enable and empower multiple benefits across New Zealand's range of natural assets including biodiversity, aquatic ecosystem health, soils, climate, and healthy vibrant communities.
6. B+LNZ is actively engaged in environmental management, with a particular emphasis on building farmers' capability and capacity to support an ethos of environmental stewardship, as part of a vibrant, resilient, and profitable sector based around thriving communities. Protecting and enhancing New Zealand's natural capital and economic opportunities and the ecosystem services they provide is fundamental to the sustainability of the sector and to New Zealand's wellbeing for current and future generations.
7. There is no doubting that the challenges facing New Zealand are significant, and will require step changes in how New Zealand values and manages the natural resources that support our way of life.
8. Farmers, and sheep and beef farmers have an in-built capacity for change. The shifts in the industry in the 1980s when subsidies were removed and farming businesses were restructured are an extreme example, that saw new farming systems develop to maximise economic opportunities within the constraints of the natural environment. However, the policy changes of the 1980's were not without significant costs to the industry, farming businesses, and the rural communities they supported. These changes, at the less extreme end, saw sheep and beef farmers adapt to climatic, societal, consumer and regulatory requirements, provided there was the flexibility and time to do so.
9. Since 1990 sheep numbers have reduced by over 50%, while the volumes of production are just 8% less. This has been achieved through a range of improvements, termed eco efficiency gains, including improved genetics and breeding, feed management, reproductive rates, and increased individual animal size. Beef cattle numbers likewise have reduced by around 20% since 1990. These reductions in capital stock while improving productivity has resulted in not only improvements in environmental performance such as 21% reduction in nitrate leaching per kg saleable product, but has been accomplished while the sector has increased its exports by 83% to over \$9 billion.
10. The sheep and beef sector is essential to maintaining the vibrancy of rural communities and their cultural, societal, and environmental wellbeing, as well as contributing regionally and nationally to the country's economic wellbeing. While reducing its environmental footprint, the New Zealand sheep and beef sector has increased its contribution to New Zealand's economic wellbeing. The Sheep and Beef sector's total value of production was \$10.4 billion in 2018, with exports worth over \$9 billion and domestic sales worth \$2.9 billion. The sector has 80,000 employees, 59,000 of those are directly employed and an additional 21,000 are indirectly employed. The sector exports over 90 percent of its production and is New Zealand's second largest goods exporter and New Zealand's largest manufacturing industry.
11. To build resilience across all our well-beings and provide for current and future generations, B+LNZ's view is that environmental policy and implementation

pathways should incentivise behaviour change if and when required including rewarding early adoption, be transformative in design, and enable and empower individuals and communities to build resilience across all their well-beings, including ecosystem services, community and cultural wellbeing, and economic wellbeing. While policy and pathways need to provide for clear and timebound outcomes to enable business and community certainty including investment certainty, they will also need to provide carefully crafted frameworks which enable flexibility and innovation and provide for business and community adaptation.

12. As such it is imperative that domestic biodiversity policy is not created in silo and that instead it provides a transformational policy foundation which will deliver not only on New Zealand's international commitments but will also enable and empower New Zealand's sheep and beef sector to continue to build diverse, resilient, productive landscapes for the benefit of all New Zealand and in maintaining vibrant thriving communities.
13. The principles B+LNZ adhere to are:
 - i. Policy should recognise, reward, and incentivise biodiversity work on farm.
 - ii. Biodiversity is a valued and inherent part of productive farming systems.
14. B+LNZ welcomes the opportunity to further discuss any of the points above with the Department of Conservation, should you require more information.
15. For any inquiries relating to this feedback please contact Lauren Phillips on 027 279 0117 or lauren.phillips@beeflambnz.com.

Yours faithfully



Lauren Phillips

Environment Policy Manager – South Island

20 September 2019

Part 1: Aotearoa New Zealand Needs a Renewed Strategy for Nature

How well does Part 1 of the discussion document set out the problem and consider the challenges and opportunities facing nature now and in the future.

16. Overall, the discussion document sets out the problem well and considers most of the obvious challenges and opportunities facing the natural environment now and into the future. There are however, nuances which have been overlooked and areas where B+LNZ proposes changes. These are addressed below.
17. B+LNZ proposes that the New Zealand Biodiversity Strategy (NZBS) reconsider some of the key words it has used, as these will impact on other policy tools and the way that they are received and implemented.
18. The document uses the word 'Nature' to describe the living environment 'to a focus on re-establishing ecological processes, strengthening resilience and restoring connections between species, including humans, ecosystems and the environment.' It is intended to convey the wider processes, functions, and connections of the natural environment, including non-indigenous species and systems.
19. B+LNZ supports this holistic and integrated approach to valuing our environment² and working across it in a way which recognises: humans as part of the environment; the provisioning of ecosystem services; interconnected nature of ecosystems; and the importance of building resilience. We ask for this to be retained.
20. The Oxford English Dictionary, however, defines 'nature' as: *The phenomena of the physical world collectively, including plants, animals, the landscape, and other features and products of the earth, as opposed to humans or human creations.*
21. Words are important. The word 'nature' has significant plain English connotations and associations which differ between people and cultures. To some it can mean the natural world to the exclusion of human beings and anthropogenically modified environments and non-indigenous species. Modified environments constitute the vast majority of New Zealand's land cover, substantially reducing the NZBS's scope. Moreover, use of the word in other culturally influential parts of the world lends itself to a far less relevant or local interpretation. B+LNZ suggests that another term might be more appropriate and more relevant to use instead of 'nature'. It is noted that the discussion document uses another term on page 9, Te Taiao.

² RMA (1991) Defines the Environment as: **environment** includes—

- (a) ecosystems and their constituent parts, including people and communities; and
- (b) all natural and physical resources; and
- (c) amenity values; and
- (d) the social, economic, aesthetic, and cultural conditions which affect the matters stated in paragraphs (a) to (c) or which are affected by those matters

22. Te Aka defines Te Taiao as: *The light of day, world, Earth, nature, enduring world, or the natural world.*
23. As stated on page 9, Te Taiao underpins our identity and wellbeing. Te Koiroa o e Koiora recognises that non-indigenous species and systems have been an important mainstay of New Zealanders prosperity and wellbeing since the country was settled by human beings. In that light, B+LNZ suggests that Te Taiao offers a more inclusive and holistic definition of New Zealand's wider processes, function, and connections of the natural environment, including humans, ecosystems and other species than the word 'nature'.
24. The discussion document is clear that New Zealand's indigenous biodiversity is something very special and unique to this country; it can and does form an important part of New Zealanders' sense of identity. New Zealand's indigenous language is another intrinsically valuable, threatened, unique, and special asset the country should be able to identify with; and offers words that are imbued with meaning beyond what we have available to us in the English language. A number of these terms are used throughout the discussion document and it would be appropriate to carry this through to provide a more accurate and meaningful description of the living environment with a distinctly New Zealand interpretation.
25. Because words are important, Te Koiroa o Te Koiora's use of kaitiakitanga and stewardship have also been noted. B+LNZ supports the discussion document's statement that all New Zealanders have a responsibility to care for natural places, and that activities need to be sustainable and work within environmental limits to protect Te Taiao. This is true irrespective of land ownership, location, or whether one is an individual or a company. The word kaitiakitanga has been applied almost solely to tangata whenua, however; while the word stewardship has been used for everyone else.
26. The difference between kaitiakitanga and stewardship is arguably as great as the difference between governorship and tino rangatiratanga. Kaitiakitanga is a much richer word that denotes deeper responsibility and connection to the resources being managed than stewardship does. Using the two different words for different sectors of society raises several potential issues:
 - i. It creates a greater obligation of care for one sector of society than for everybody else. The NZBS essentially hopes to see a paradigm or culture shift in New Zealand where indigenous biodiversity is something that all New Zealanders value and secure for future generations by working together as communities. On the one hand, setting different standards of care across communities can work against this goal by creating different expectations of what that culture shift looks like and who is responsible for making it.
 - ii. On the other hand, equity is important to ensure that communities can work together to meet their responsibilities, where all the members of that community understand that they share the same obligation to contribute to Te Taiao. This would strengthen communities and bring diverse aspects of those communities together, especially in rural and remote areas.
 - iii. Farmers work with their land every single day, their livelihoods depend on it. The land and the way they manage it often form part of their own culture, their identity, their place in their community, their family history and the

legacy they see themselves leaving to their children. Most farmers would consider themselves kaitiaki of their land. Assigning a lesser label of 'steward' fails to recognise the deep connection that many farmers have to the resources they manage and the natural environment they live in, as well as the work they do to contribute to Te Taiao which is not necessarily for commercial gain. Devaluing the relationship that farmers have with Te Taiao disincentivises developing that relationship and their contribution to improving intrinsically valuable elements within it, for example indigenous biodiversity.

27. The way that resources are managed in productive systems can play a positive role in creating environments that support or benefit indigenous species, for example grazed pasture as habitat for indigenous herpetofauna with reduced predation by rodents, or poplars planted for shelter and erosion control providing roosting sites for native bats. Te Koiroa o Te Koiroa recognises the benefits that non-indigenous species offer and recognises that New Zealand's ecosystems can't return to the state they were 800 years ago. B+LNZ supports this and the discussion document's understanding that a balance needs to be reached which accepts the place of non-indigenous species, and human modified habitats, in providing for multiple well-beings across New Zealand, including in supporting and building ecosystem services.
28. B+LNZ also acknowledges that land use has been and continues to be a key pressure on indigenous biodiversity.
29. European settlement in New Zealand brought with it a focus on taming the land, and government at every level helped to institutionalise and incentivise this as native habitats were cleared to make way for pastoral farming and urban development, and species were introduced to provide food and fibre and also for amenity values. Indigenous flora and fauna were considered of lesser value, and were subsequently controlled in order to make the best use of resources, as best use was defined at the time. This direction from the top, resulted in the devaluing of indigenous species and their decline across New Zealand's landscapes. Bounties were offered for kea beaks and eels, and farmers who didn't drain and graze wetlands were considered inefficient by others in the community.
30. This was not and is not unique to rural and farming communities. Indigenous biodiversity is not prioritised or integrated into most urban spaces, in part because it wasn't/isn't valued or considered aesthetic. Indigenous flora tends to be cryptic, and often requires more nurturing to help get it going than exotic species. Green lawns are preferred in back gardens because they are more lifestyle-friendly than tussock grass; and flowering cherries are more popular in public spaces than slow growing kahikatea.
31. Perspectives changed to valuing New Zealand's indigenous biodiversity in the last century, and as page 16 of Te Koiroa o Te Koiroa recognises, focus shifted to addressing threats to New Zealand's indigenous flora and fauna rather than addressing the drivers of those threats.
32. Direction from the top over the last decade in particular has changed from a mandate to control and eliminate, to recognising and protecting indigenous habitats through Protected Natural Areas and Significant Natural Areas. This approach can have the effect of alienating and essentially penalising rural land owners who have retained and protected indigenous habitats and species

within their productive landscapes, and in installing views that indigenous habitats and productive landscapes are mutually exclusive. Farmers who had retained and protected /or enhanced indigenous habitats are penalised through loss of autonomy, fundamental property rights, and a loss in land value. This approach has endorsed the view that indigenous biodiversity is, and has to be kept, apart from productive landscapes and systems, even where it had been an inherent part of the productive system.

33. Perceived appropriation of private land for public good can devalue indigenous biodiversity by making it the object of unfairness and inequity in relation to productive opportunity. This approach has discouraged other landowners who might have considered encouraging indigenous biodiversity on their property, due to a loss of property rights and increased regulatory burden.
34. These issues in relation to the recognition and potential policy approaches for protecting indigenous biodiversity, in both rural and urban communities, is a challenge which the discussion document has failed to adequately address. The sheep and beef sector is part of the solution to this challenge in rural areas and the NZBS could make strides towards achieving the culture shift it hopes to instil by recognising the social and institutional factors required to recognise, value, and protect New Zealand's indigenous biodiversity.
35. The success of the NZBS in rural areas relies on dismantling the institutionalised separation of indigenous flora and fauna from productive landscapes, to allow farmers the space socially and economically, to re-evaluate their relationship to and with it. To incentivise and support farmers and communities to value, recognise, and enhance indigenous biodiversity as part of healthy and resilient landscapes, which improve the health and wellbeing of people and their communities. The NZBS needs to establish a framework for farmers to review their place in Te Taiao.
36. The NZBS should encourage the inclusion and use of biodiversity as a valued and inherent part of productive farming systems. Its framework must also provide farmers with the safety to include and use biodiversity as part of their systems without threat of personal loss.
37. Doing so would offer part of the solution to another of the key pressures on indigenous biodiversity which is climate change.
38. As Te Kōiōra o Te Kōiōra explains on page 15, we do not know how our indigenous species will respond to changes caused by climate change. Species with small populations, which do not enjoy a wide distribution, or which rely on habitat and food sources that are themselves at risk, are particularly vulnerable.
39. Providing farmers with the ability to manage their productive systems in a way that includes and integrates indigenous vegetation will help to make indigenous species more resilient to climate change. Increased indigenous vegetation – and therefore fauna – across New Zealand's landscapes will provide a bigger gene pool and one that has already adapted to persist in challenging environments, for example where they co-exist with non-indigenous browsers. It would provide automatic corridors, linkages across the islands from mountains to the seas, for species to travel along and increase their distribution. It would also provide shelter and food for indigenous species where

exclusively indigenous areas suffer losses and are no longer able to support other species in the same capacity, for example through fire or diseases.

40. Te Koiroa o Te Koiroa identifies two main drivers of biodiversity loss. B+LNZ does not consider the discussion document has adequately identified the drivers of loss, as mentioned above. B+LNZ nevertheless supports Te Koiroa o Te Koiroa's focus on the drivers of loss, and the recognition that these need to be addressed in order to understand the threats to loss.
41. In terms of the two drivers that have been identified, the legal and regulatory frameworks as drivers of loss have already been alluded to in the paragraphs above.
42. B+LNZ would like to comment on the other driver which Te Koiroa o Te Koiroa identifies, which was that our decision making and economic systems often fail to account for the value of nature. The discussion document states that:
 - i. our decision making frameworks are not sophisticated enough to value biodiversity, the services it provides, or the impacts of its loss; and
 - ii. the market fails when individuals are able to benefit at the expense of the natural environment and therefore society in general; and
 - iii. individual decision making fails to account for or foresee the cumulative impacts of those decisions; and
 - iv. that New Zealand offers few incentives for landowners to conserve biodiversity.
43. B+LNZ supports these statements and wishes to reiterate that New Zealand also offers significant disincentives for individual landowners to conserve biodiversity.
44. Economic decision making in New Zealand post European settlement has been encouraged as an individualistic endeavour rather than a collectivist one, and this is representative of European and western culture generally. Changing this mentality will require a framework that actively encourages and empowers collective action for biodiversity gains. Communities need to be empowered and supported to act across social sectors; and that action needs to be recognised and rewarded. Acting in a collective setting, for farmers, allows participants to achieve greater net gains for biodiversity and helps decision makers to understand how their decisions and actions both achieve wider gains or have cumulative impacts.
45. B+LNZ would like to emphasise that decision making, whether on an individual or community level, is not helped by tensions between policies and the confusion that this creates over priorities. Policies need to provide clear and consistent messaging to ensure that both urban and rural land users understand what their priorities are. It is important that policies work together and do not compete. For example, a farmer who may have considered allowing a hillside to regenerate into native bush might be better off putting that hillside into pine plantation in order to offset carbon emissions because pine trees are currently considered to capture carbon more quickly than indigenous vegetation and as such is incentivised over indigenous habitats through tools such as Emission Trading Scheme and planting subsidies. As such indigenous

biodiversity loses out because climate change policy and biodiversity policy have not been designed to work together.

46. B+LNZ supports the proposed scope of the new biodiversity strategy as one for all New Zealanders to own and implement, and to cover all ecological domains and type of tenure – land, freshwater, estuaries, wetlands, and the marine environment.
47. B+LNZ also supports the NZBS system in its aim to act as an over-arching canopy to provide direction and coordination to the instruments that follow it. B+LNZ suggests a small but important change to the figure on page 22, however. The second pillar Figure 5 lists landowners, conservation volunteers, restoration groups, ecosanctuaries, and recreational users as the range of private people (who are not Treaty partners) involved in the biodiversity system envisioned by the NZBS. That list is incomplete.
48. As Te Kōiropa o Te Kōiropa repeatedly states, indigenous biodiversity is for everyone and it is everyone's responsibility. The list in Figure 5 needs to account for individuals who use land but do not own it, and individuals whose lives and lifestyles can have a positive or negative effect in indigenous biodiversity. This will allow urban people who are not necessarily part of a volunteer group to find their place in Te Taiao and understand how they can contribute to New Zealand's indigenous biodiversity. Leaving them off the list does not allow a large swathe of society to see their own obligation or capacity to drive change, whether that is desexing their pets to reduce feral predator pressures or choosing native plants for their gardens to provide a food source for urban indigenous fauna.

Part 2: Proposals for a Strategy

Part 2.1: The Proposed Strategy Framework

Question 2: what do you think of the proposed strategy framework? Does it provide a useful way of linking the elements of the strategy together?

49. B+LNZ supports the proposed strategy framework in principle, but proposes several changes in the table below to help the framework achieve the outcomes that the NZBS seeks.
50. Generally, B+LNZ would like to reiterate feedback given at the consultation workshop on the discussion document held in Christchurch 30 August 2019. This document will apply to all New Zealanders and so needs to be written in plain language that makes obligations created and implications of what the document says clear. While the current language is inspiring, it does not necessarily make those obligations and implications clear. For example, landowners need to understand what where the strategy says '*All New Zealanders can connect with nature and recognise its value in supporting intergenerational wellbeing*', it needs to be made clear that this is more than an aspirational sentiment. It signals that the strategy wants to ensure there is enough indigenous biodiversity across New Zealand that everyone will have access with it (*connect with nature*) and that the strategy will require

intergenerational justice (*intergenerational wellbeing*) in policies and decisions which affect indigenous biodiversity going forward (*recognise its value*).

Table 1: Feedback on the Proposed Strategy Framework

Item	Position	Discussion
Action – Assess – Action template for all three pillars	Support	Retain this structure
Whakahau – Empower		
Connect and value	Support in part	<p>The language needs to be clearer as per paragraph 50 above.</p> <p>Replace ‘nature’ with Te Taiao and amend the wording to be more clear on the outcomes sought.</p>
Tangata Whenua	Support in part	<p>B+LNZ acknowledges the discussion document’s need to recognise the special role of tangata whenua with regards to Te Taiao.</p> <p>However, all New Zealanders need to be able to consider themselves as kaitiaki, and empowered to act as kaitiaki over the resources within their influence in order to give effect to the intent of the NZBS. The wording should provide for that. An additional provision should be included in this pillar which reflects this, as the rest of the framework does not.</p>
Tiaki – Protect + Restore		
Ecosystems	Support	
Species	Support in part	Please amend the wording as follows:

		<i>Aotearoa New Zealand's indigenous species and their habitats are secured and thriving, and their future is <u>secure</u></i>
Threats	Support	
Wananga – Systems + Behaviour		
Economic Activity	Oppose in part	Please amend the wording as follows <i>Aotearoa New Zealand's economic activity provides for the restoration <u>integration, management, and protection</u> enhancement of indigenous biodiversity</i>
Non-Indigenous Species	Support	
Global	Support	

Part 2.2: Vision

Question 3: What do you think of the proposed vision for Aotearoa New Zealand and its timeframe

51. B+LNZ proposes that Te Taiao is used instead of 'Nature' for the reasons given in paragraphs 20-24 above. If only indigenous biodiversity and its systems are considered for this vision then the vision needs to be clear about that and simply call it 'Indigenous biodiversity.' B+LNZ otherwise supports the first part of the vision, which is that by 2070 '[Te Taiao/ Indigenous biodiversity] in Aotearoa is healthy, abundant, and thriving.'
52. The second part, 'Current and future generations connect with nature, restore it and are restored by it.' The drafting of this part of the vision doesn't offer a meaningful addition to the first part, and B+LNZ suggests rewording it. It is also unclear in parts with several interpretations possible for the same word. For example, restoring indigenous biodiversity suggests rehabilitation. This is serious obligation and does not align with Te Koiora o Te Koiora's acknowledgement that we can't return the environment to the state in which we found it 800 years ago.

Part 2.3: Values and principles

Question 4: What do you think about the proposed values and principles? Is there anything you would add or change? Which of the values and principles do you think are most important?

53. B+LNZ supports the proposed values with the following reservations and qualifications:
 - i. We do not consider stewardship and kaitiakitanga to be interchangeable words of equal value, and the values of the NZBS should not use them as such.
 - ii. As stated above, words matter. B+LNZ would like reassurance that the Department of Conservation sought guidance from appropriate Te Reo experts to ensure that the Maori words used in the values have been accurately translated for the purposes of the NZBS.
54. B+LNZ supports the principles listed in Te Koiroa o Te Koiora and propose an additional principle: Recognition.
55. Policy should recognise and reward biodiversity work, particularly on farm where costs are largely carried by individuals for no commercial gain. This is important for shifting peoples' perceptions around the value of biodiversity on their land and the value of their efforts for the wider community. Current policy and tools do not offer this recognition.

Part 2.4: Long-term outcomes

Question 5: What do you think about the proposed long-term outcomes? Is there anything you would add or change?

56. Feedback has already been provided on the long-term items in Table 1 above, and only minor additions are provided in this section.
57. With regards to Whakahou, B+LNZ reiterates the points made in paragraphs 25 and 26 about kaitiakitanga.
58. With regards to Tiaki, B+LNZ reiterates the points made in paragraphs 29-38 above.
59. With regards to Wananga, B+LNZ reiterates the points made in paragraphs 44 and 45 above.

Part 2.5: Goals – tracking our progress

Question 6: What do you think of the proposed set of goals? What are the most important things to track to measure our progress? What else should be included?

60. B+LNZ supports the short term goals with the following qualifications and suggested additions:

- i. Where pest control and eradication is envisioned on private land, support must be given to private land owners to achieve this.
- ii. By 2025, communities are empowered and supported to achieve biodiversity outcomes in their catchments.
- iii. By 2025, farmers' biodiversity work on farm and within their communities is recognised and rewarded for providing a service on their private land for the good of wider New Zealand.
- iv. By 2025 all New Zealanders are responsible for indigenous biodiversity.

Part 2.6: Implementation

61. B+LNZ supports the proposed plan for implementation planning provided that substantive consultation is held with potentially affected stakeholders, particularly when developing the five-yearly implementation plans themselves.
62. B+LNZ supports the proposal for progress reporting and review provided that it is conducted in good faith, with transparency and no surprises for potentially affected stakeholders.

Part 2.7: Five system shifts to support change

Question 9: What do you think about the five system shifts? Are they the right areas to focus on in the near term are there other areas that should be included?

63. B+LNZ supports System Shift One in principle.
64. B+LNZ supports System Shift Two in principle.
65. B+LNZ supports System Shift Three in part and in principle, and requests that the system shift is amended to:
 - i. reflect the feedback provided at paragraphs 18-27, 35, 43, 44, 45, 47, 48, 54, and 55 above.
 - ii. provide more than mere assessment and review of funding and support to communities. To empower communities to take action, more funding and support needs to be given.
66. B+LNZ supports System Shift Four.
67. B+LNZ supports System Shift Five in principle, and would like to see that any data commons is easily available to individuals in a user friendly format and at no cost.

Part 3: International Context

68. A global vision and targets for biodiversity should allow for local variation, diversity, priorities and cultural norms. B+LNZ does not support blanket approaches to resource management. The vision and targets should also allow for flexibility so that the people working to achieve them are able to adapt to changing conditions in the environment, technological and knowledge advancements, and to work within financial and resource constraints particular to the locality in question.
69. Our commitment to any global instrument should reflect what we have committed to at a domestic level in order for that to
 - i. Be attainable; and
 - ii. Reflect the values and priorities of the New Zealand people; and
 - iii. Ensure that what we commit to reflects what we are capable of achieving.