



WWF-NEW ZEALAND

BRIEFING TO THE INCOMING GOVERNMENT

NOVEMBER 2023

WHO WE ARE

The World Wide Fund for Nature (WWF) is the world’s largest conservation organisation. Our mission is to stop the degradation of the planet’s natural environment and build a future in which humans live in harmony with nature.

In Aotearoa New Zealand, **we are the leading voice for our ocean and nature.**

Our mission could not be more important. New Zealanders have an intrinsic connection to the land, ocean, and wildlife – and our economy depends on a healthy environment.

But our natural world is at a crisis point.

New Zealand has the highest species extinction rate in the world, with 4,000 of our native species either at risk or threatened with extinction.

This includes 90 percent of our seabirds, 82 percent of our native birds, 94 percent of our reptiles, and 72 percent of our native freshwater fish.

Many of these treasured creatures are not found anywhere else on Earth, but future generations won’t get the chance to see them in the flesh.

And our ocean – the lifeblood of communities up and down the country – is under threat from overfishing, plastic pollution, and rising sea temperatures.

Our marine environment is home to 80 percent of our indigenous biodiversity, but we are failing to properly look after it. Many of our marine species and ecosystems are in a perilous state.

It can no longer be credibly argued that climate change and nature loss are tomorrow’s problems.

CONTENTS

Who we are	1
.....	
Our priorities	2
.....	
<i>Halting nature loss</i>	2
.....	
<i>A thriving ocean</i>	5
.....	
<i>Nature at the heart of climate action</i>	8
.....	
Working together	11
.....	



We're seeing their impacts in New Zealand now, today – with climate-related weather events of increasing scale and frequency and wildlife disappearing at an alarming rate.

The cost-of-living crisis is with us for the short-term. Like most other countries struggling with the aftermath of the Covid-19 pandemic, New Zealand's economy will recover. By contrast, climate change and nature loss are existential crises. Their costs – both fiscally and in terms of lives, livelihoods and the wellbeing of people and nature – will span generations.

We want to see action now, and we want to work with you on these critical issues.

We're well placed to do so, as WWF is uniquely positioned across New Zealand's NGO landscape.

Our global network gives us invaluable connections and access to unrivalled expertise across a wide range of environmental policy issues. And we bring together individuals, communities, businesses, and government to develop and implement innovative, evidence-based solutions.

We look forward to working constructively with you on the most pressing issues of our time.

OUR PRIORITIES

In Aotearoa New Zealand, WWF's key focus is on protecting our ocean and accelerating action at the nexus of climate change and biodiversity loss.

We want to work with you to enhance action in these three key areas:

*Halting and reversing nature loss;
Ensuring a thriving ocean for future generations;
Putting nature at the heart of climate action.*

HALTING AND REVERSING NATURE LOSS

Our economy and society depend on a healthy natural environment.

Conservation and nature-related tourism support regional economies, and New Zealand is renowned internationally for its clean, green image.

Whilst biodiversity decline is a global issue, it is particularly acute in New Zealand due to our high levels of endemism. Many of our species are found nowhere else on Earth. Our wildlife is already in crisis – with nearly 4,000 native species either at risk or threatened with extinction, and 63 percent of ecosystems threatened.

The fact that we have the highest proportion of threatened species in the world doesn't tally with our global reputation.

Every business relies on nature for resources and ecosystem services such as water, food, fibre, minerals, pollination of crops, water filtration and climate regulation. But nature is at a tipping point.

Under current scenarios, over half of the world's total GDP – roughly \$44 trillion – is at moderate or severe risk due to nature loss.



Copyright Credit © Copyright owner / Tomas Sobek



Given our high dependency on primary industries, New Zealand's risk profile is much higher than the global average.

There are also significant opportunities. Nature-based solutions to climate change have the potential to deliver at least 30 percent of the emissions reductions we need by 2030, and offer valuable protection against the economic costs of climate change, while contributing to food and water security. They could also lift a billion people out of poverty and add \$2.3 trillion in growth to the global economy.

Nature is also the bedrock of our tourism industry. In New Zealand, international tourists spent \$1.9 billion in the year to March 2022, and in that same year, around 80 percent of New Zealanders visited protected natural areas (like our national parks, reserves and beaches) and 75 percent of them visited our heritage sites. There are currently more than 5,000 concessions for businesses to operate in public conservation lands and in our country's few marine protected areas. Prior to the Covid-19 pandemic, tourism was New Zealand's biggest export industry – and it will be instrumental in our economic recovery.

People come to New Zealand to experience our wild landscapes and unique biodiversity. But the ongoing loss of our native species and ecosystems puts all this at risk.

New Zealanders increasingly realise that we are at a defining moment for nature – and that nature loss, along with climate change, are the critical issues of our time.

WWF played a leading role in the development of the ambitious goals and targets in the new Kunming-Montreal Global Biodiversity Framework, which seeks to deliver the transformational change needed to halt and reverse the loss of biodiversity by 2030. We would welcome a discussion with you on your plan to advance its implementation in New Zealand.

WWF would like to see:

The creation of an Act for Nature

We want to see the outdated Wildlife Act 1953 replaced with an 'Act for Nature.'

A major flaw of the Wildlife Act is that it covers only some of our native species. It doesn't apply to plants, and the only native freshwater fish protected (the grayling) is extinct. Yet we know all species – from the smallest protozoa to the Antarctic Blue Whale – and every ecosystem are inextricably connected.

We need an 'Act for Nature' that applies a system-wide lens.

And as part of this, we need a concrete, actionable plan to meet our commitments to protect, enhance and restore nature, including key targets under the Kunming-Montreal Global Biodiversity Framework.

An 'Act for Nature' should commit us to restoring degraded ecosystems (Target 2), protecting 30 percent of our land, freshwater, and ocean by 2030 (Target 3), and taking action to halt human-induced extinctions of our native species (Target 4).



The new Act should make these biodiversity goals and targets binding, much in the same way the Zero Carbon Act 2021 did for our Paris Agreement commitments.

Above all, we need to create a system of species and ecosystem management that fosters collaboration. As outlined in *Te Mana o Te Taiao*, New Zealand's national biodiversity strategy, this challenge requires central government, local government, tangata whenua, landowners, businesses, and communities to work together.

Sufficient funding for the Department of Conservation

The Department of Conservation (DOC) manages a third of the country, our marine protected areas, and our native species – for less than one percent of GDP.

DOC has a huge and important job and has been chronically underfunded since its inception in 1987.

Alongside other environmental NGOs, we are deeply concerned by your Government's proposed cuts to DOC's already stretched budget.

The native forests that DOC manages – along with other native ecosystems, like wetlands and peatlands – could play an important role in enabling New Zealand to meet our international climate commitments. However, the health of these ecosystems – including their ability to sequester carbon – is declining as a result of damage inflicted by browsers (deer, tahr, chamois) and possums. At present funding levels, DOC is unable to manage pests, predators, and weeds to maintain forest health. This needs to be urgently addressed.

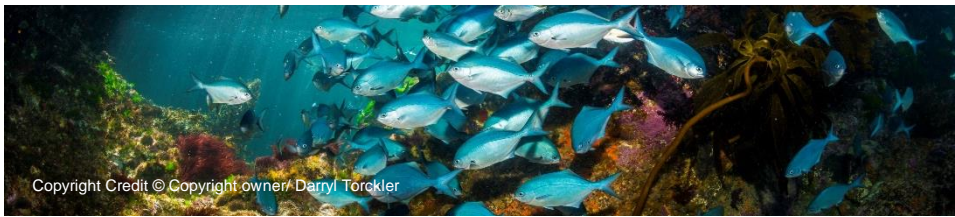
We want to see DOC sufficiently funded to fulfil the most important planks of its mandate: conserving the native species and ecosystems that New Zealanders treasure, and upon which our economy and wider wellbeing rely.

Implementation of the National Policy Statement on Indigenous Biodiversity (NPSIB), including through further reform of the Resource Management Act 1991

WWF notes your pledge to repeal the Natural and Built Environment Act (NBA) and Strategic Planning Act (SPA) by Christmas 2023, with the intention to revert to previous RMA rules. We also note the commitment in the NZ First and ACT Party coalition agreements to commence a review into the implementation of the National Policy Statement on Indigenous Biodiversity and cease implementation of new Significant Natural Areas (SNAs).

Since its inception in the early 1990s, the Resource Management Act has not done well by nature. Its inability to manage cumulative effects has meant that our native species and ecosystems have been suffering a 'death by a thousand cuts'.

New Zealand now has the most threatened species per capita globally, and a host of threatened ecosystems. This is not just about 'nature for nature's sake'; New Zealand's economy relies on healthy, functioning ecosystems.



To remedy the advancing decline of nature in New Zealand, our view is that key aspects of the NBA and SPA framework – particularly the role of environmental limits and targets, and the inclusion of a best practice effects mitigation hierarchy – should be retained.

Beyond this, we consider the effective implementation of the National Policy Statement on Indigenous Biodiversity (NPSIB) critical to ensuring improved and more consistent practice in councils' management of indigenous biodiversity on private land, including through their engagement with tangata whenua and other landowners.

WWF will strongly oppose any move to weaken the provisions of the NPSIB, including revision of the science-based criteria that guide the identification of Significant Natural Areas (SNAs). We would welcome enhanced implementation support for this important and much overdue national direction.

The creation of a world-leading biodiversity incentives scheme

With a view to enabling tangata whenua and landowners to realise value from SNAs, and to recognise the efforts of those who have chosen to protect indigenous biodiversity on their lands through covenanting schemes, WWF would like to see further work on the creation of a biodiversity incentives scheme progressed as a matter of priority.

With appropriate settings in place to ensure its integrity, the creation of a biodiversity credit system would incentivise and accelerate the protection and restoration of our declining native ecosystems and wildlife. It would also recognise the contribution that tangata whenua and other private landowners, farmers, the business community, and others can make alongside government efforts to meet New Zealand's commitment to halt and reverse the decline of nature by 2030.

We note National's 100 point economic plan commits to recognising on-farm carbon sequestration, and the NZ First coalition agreement commitments to progressing work on other forms of sequestration, including blue carbon. A biodiversity incentives scheme could be an avenue by which these commitments are progressed.

ENSURING A THRIVING OCEAN FOR FUTURE GENERATIONS

Aotearoa New Zealand has a vast maritime area of over 4,083,000 square kilometres. Our ocean territory is one of the ten largest in the world and is fifteen times larger than our land mass.

New Zealanders have a deep love of the ocean, and our economy relies on it. A total of \$7.4 billion is directly related to sectors active in the marine environment. Critically, our ocean is estimated to support up to 80 percent of New Zealand's biodiversity.

Despite this, **we are failing to look after, restore and sustain our ocean for future generations.**

Currently, less than one percent of New Zealand's ocean territory is protected. Important areas, like the Hauraki Gulf / Tikapa Moana, are in a state of sustained and dramatic decline. Plastic pollution is evident in even the most remote areas of our ocean.



The impact on our marine species has been dramatic. Since 1970, some of our commercial fish stocks have declined by more than 80 percent. Many popular fishing areas are depleted – and in some places, key stocks like scallops, rock lobster, and snapper are functionally extinct. 30 percent of our marine mammals and 90 percent of our seabird species are threatened with or at risk of extinction.

Ahead of the election, WWF identified *10 Asks for the Ocean*: ten critical and necessary steps to ensure a thriving and resilient marine environment. All parties responded to the ‘10 Asks’ in a considered way, and these responses are publicly available in full on the WWF website.

We note the commitments in the NZ First coalition agreement relating to the productivity of the seafood sector, and submit that these actions need to be complemented with substantive and urgent interventions to protect and restore New Zealand’s declining marine biodiversity.

We warmly welcome the National Party commitments in the *Blueprint for a Better Environment* to advance marine protection in New Zealand by undertaking marine protected areas legislative reform, and accelerating the progress of the Hauraki Gulf Marine Protection Bill and Rangitāhua / Kermadec Ocean Sanctuary to completion.

We look forward to supporting you to progress these important initiatives at pace.

WWF would like to see:

At least 30 percent of New Zealand’s ocean territory protected by 2030 through a network of Marine Protected Areas

Marine Protected Areas (MPAs) are an essential tool to protect and restore our marine environment. They allow marine habitats and the creatures that rely upon them to recover and thrive. It is well established that MPAs also benefit the communities and industries that rely on these areas for their livelihoods, such as commercial and recreational fishers and tourism operators.

To turn the tide on biodiversity loss, it is internationally accepted that we need at least 30 percent of our ocean placed in an integrated network of well-managed highly protected areas. In New Zealand, this includes ensuring the protection of ecologically significant or particularly vulnerable marine habitats, including through the creation of a Kermadec / Rangitāhua Ocean Sanctuary and new MPAs in the Hauraki Gulf / Tikapa Moana.

New Zealand committed to the 30 percent protection target by adopting the Kunming-Montreal Global Biodiversity Framework and the UN High Seas Treaty.

A key intervention required to enable New Zealand to meet this commitment is reform of the out-of-date Marine Reserves Act 1971, which was world-leading on enactment but is no longer fit-for-purpose. To achieve a healthy and resilient marine environment, we need a new legislative framework for marine protection – one which responds to the rights and interests of tangata whenua, includes best practice tools, and interfaces effectively with our fisheries management system.



Our fisheries managed more sustainably

WWF wants to see the Quota Management System (QMS) reformed to require our fisheries stocks to be managed for abundance and resilience, and to safeguard them for future generations. Since 1970, we've seen up to an 80 percent decline in key fish stocks, with 20 stocks considered overfished and depleted as of 2022. In light of our changing climate, we need to be managing New Zealand's fisheries for abundance and resilience.

Following on from the recent release of the Fisheries Industry Transformation Plan (ITP), there is urgent work required to reduce the environmental footprint of the commercial fleet – particularly with respect to a phase out of the most harmful fishing methods.

Mobile bottom-impact fishing methods like bottom trawling are indiscriminate and decimate everything in their path. On seamounts, bottom trawling destroys marine habitats that are integral to ocean health and take hundreds of years to recover. This is why, along with many others, WWF seeks an end to bottom-impact fishing methods and seabed mining on vulnerable and highly biodiverse marine ecosystems, including seamounts and similar features.

Areas experiencing sustained decline, such as the Hauraki Gulf / Tīkapa Moana, are particularly vulnerable to mobile bottom-impact fishing methods. We urgently need to transition away from these destructive practices to enable the recovery of benthic habitats and species in these important ecosystems.

Notably, New Zealand is one of the only countries still bottom trawling on seamounts in the high seas. Globally, the social licence for bottom trawling on sensitive benthic areas is well and truly gone. The ongoing competitiveness and sustainability of New Zealand's seafood industry relies on an expedient transition away from these practices.

Ultimately, WWF believes New Zealand's seafood industry could become world-leading and secure both a price premium and priority market access by improving the sustainability and transparency of our harvest practices. We want to see the implementation of fully transparent and traceable fisheries management through the use of monitoring systems such as cameras or observers across all commercial fishing fleets. And importantly, we want to see this captured data made publicly accessible.

More action to tackle the waste that pollutes our ocean

More than 11 million metric tonnes of plastic ends up in our ocean every year. Shockingly, the volume of plastic pollution in our ocean is predicted to outnumber fish by 2050.

Plastic is extremely harmful to marine life and kills up to 100,000 marine mammals annually. The adverse impacts of oceanic plastic pollution on human health are also increasingly well documented.

Voluntary national action to stem plastic pollution is having limited effect. Over the past five years, despite 60 percent growth in national and subnational policies, total plastic in the ocean has increased by more than 50 percent.



In March 2022, UN Member States agreed on a mandate to negotiate a legally binding global treaty to end plastic pollution. This year, the framework is being negotiated throughout a series of meetings across the globe, with the aim of having it in place by the end of 2024.

WWF encourages you to ensure that New Zealand helps deliver a truly ambitious treaty with effective global measures.

Better protection for threatened marine species

WWF has a strong focus on improving protection for our endangered, threatened, and protected marine species – including by mandating the use of best practice mitigation technology to reduce fisheries bycatch to a target of zero by 2030.

Every year, New Zealand's commercial fishing fleet kills as many as 14,000 seabirds. Ninety percent of New Zealand's seabirds are threatened with extinction – with species like the Antipodean Albatross facing a particularly precarious future.

There are estimated to be less than 60 Mauī dolphins left in Aotearoa's waters. Both species are at particular risk of demise by being caught by commercial fishers.

We need to ensure that all available technologies that reduce fisheries bycatch are being used - - both in New Zealand's Exclusive Economic Zone and on the high seas. When it comes to our threatened taonga species, there are tools that are already available and proven best practice.

Following on from the public consultation process, we want to see New Zealand adopt the Agreement for the Conservation of Albatrosses and Petrels (ACAP) best practice protocol by making all three mitigation measures mandatory for our commercial surface longline fleet, which poses the greatest threat to seabirds like the Antipodean Albatross.

PUTTING NATURE AT THE HEART OF CLIMATE ACTION

It is now globally recognised that nature loss and climate change are twin crises. We need urgent and transformational action to address both simultaneously.

Beyond being essential for the welfare of people and nature, and from the perspective of achieving some semblance of intergenerational equity, doing so is also economically expedient.

Financing to protect and restore the planet's more fragile natural resources currently amounts to \$166 billion USD per year – less than one-sixth of the annual investment in the energy transition.

BloombergNEF estimates this will need to jump to almost \$1 trillion by 2030 to sustainably manage biodiversity and maintain the integrity of ecosystems.

While this is a sizable sum, it pales in comparison to the anticipated economic cost of biodiversity loss by the end of the decade.



Even by the World Bank's conservative estimates, the deterioration of natural processes like wild pollination and resources like marine fisheries could see global GDP come in \$2.7 trillion a year lower than projected levels by 2030.

Given our high relative dependency in New Zealand on primary industries, our risk profile is much higher than the global average.

WWF welcomes your Government's commitment to achieving New Zealand's international climate change targets, including the commitment to reach net zero greenhouse gas emissions by 2050.

Our international credibility and our export economy depend on these targets being met by gross emissions reductions, as well as net reductions (through emissions removals). Furthermore, New Zealand's Free Trade Agreements with the United Kingdom and European Union hold us to account on these international commitments.

We believe there is an opportunity for New Zealand to lead globally by prioritising nature-positive climate action.

Like climate change, ecological collapse presents an existential crisis. And as the two are inextricably linked, they can – and should – be addressed together, at scale and at pace. This is a key commitment made in Chapter 4 of New Zealand's Emissions Reduction Plan.

WWF would like to see:

Nature-based solutions prioritised as part of the Government's response to climate change

Climate change and biodiversity decline are inextricably linked, and nature-based solutions can address both.

They can remove carbon from the atmosphere, store it, and build resilience to the impacts of climate change at the same time as achieving biodiversity and other wider environmental, social and economic outcomes.

We believe you have a significant opportunity to prioritise nature-based solutions in New Zealand's climate change response, both domestically and in the Pacific region.

For example, New Zealand's mature native forests are thought to hold seven billion tonnes of carbon dioxide equivalent – equal to 86 years' worth of the whole country's greenhouse gas emissions. Keeping them healthy ensures this carbon isn't released.

And peat wetlands hold twice as much carbon as all the world's forests combined, whilst covering only three percent of Earth's land surface. The Ministry for Primary Industries estimates that New Zealand has 700,000 hectares of peatland that could be restored.

WWF has actively supported the development of the *Recloaking Papatūānuku* proposal put forward by Pure Advantage and Tāne's Trees Trust – an ambitious initiative to restore and reforest 2.1 million hectares of land in Aotearoa over ten years.



We believe this ambitious nationwide proposal could enable New Zealand to achieve its NDC whilst delivering significant co-benefits for biodiversity and society and reducing our reliance on offshore carbon offsets.

Reform of the emissions trading scheme

We appreciate your desire to deliver carbon price stability, and can appreciate the rationale in your commitments to avoid further amendments to the Emissions Trading Scheme (ETS).

However, it is plain that New Zealand's current ETS settings are not fit-for-purpose. The ETS it was designed to meet the requirements of the Kyoto Protocol – not the Paris Agreement – and, if the ETS was designed today for that purpose, it would look dramatically different.

In particular, WWF is deeply concerned that the current settings of the ETS prioritise net emissions reductions, and we consider it is not set up to drive the deep and urgent gross emissions reductions needed to limit global warming to a 1.5°C increase.

A further concern is that current ETS settings incentivise wide-spread and large-scale exotic afforestation, including on categories of land (highly productive, or highly erodible) that are not suited to plantation forestry. We consider there is no place for permanent exotic forests in New Zealand. To maximise benefit for local communities and nature, where permanent carbon sinks are proposed, they should be indigenous biodiverse forests.

We note the commitments in National's 100 Day Action Plan and the NZ First coalition agreement to allow recognition of on-farm carbon sequestration, and to progress work to recognise diverse forms of sequestration – including blue carbon. Our view is that these commitments in and of themselves will require changes to the ETS – or the creation of a separate sequestration market (a proposal which we would support).

Further, we remain deeply concerned by National's proposals to use revenue raised through the Emissions Trading Scheme to fund tax reductions and by the proposed defunding of the Climate Emergency Response Fund. We reject the assertion that this proposal is a 'market-based' approach to climate action; it is not. A climate dividend in its true form requires a direct transfer from the proceeds of ETS auctions to ordinary citizens – not to Crown coffers – and, further, rightly out to be tagged to the carbon price. We strongly oppose your proposal to defund the Climate Emergency Response Fund in this manner and for such a purpose.

WWF considers it critical that the Government invests properly in the urgent and transformational action we need to address the twin crises of climate change and nature loss. Anything less is simply not good enough.

Reconsideration of the proposed reversal of the ban on offshore oil and gas exploration

WWF notes your Government's plan to repeal the ban on offshore oil and gas exploration.

The science is unequivocal: we know that to limit global warming to 1.5 degrees, fossil fuels need to stay in the ground.



Further, the assertion by the fossil fuel lobby that New Zealand's transition to renewable energy requires gas to underpin energy security is simply incorrect.

Progressing this policy will not only hamper New Zealand in our efforts to meet our international climate commitments, but it will pose significant risk to our international trade agreements, diplomatic relations (particularly throughout the Pacific region), and international credibility more broadly.

We urge you to reconsider this ill-conceived and harmful policy commitment.

WORKING TOGETHER

We would welcome an opportunity to meet with you to discuss the priorities outlined above and how WWF-New Zealand can best support the delivery of your policies.

WWF's way of working is to bring together individuals, communities, businesses and government to develop and implement innovative, evidence-based solutions.

Our global network gives us invaluable connections and access to unrivalled expertise across a wide range of environmental policy issues.

In Aotearoa, we collaborate on environmental issues with our colleagues in other eNGOs, including Forest and Bird, The Environmental Defence Society, and Greenpeace, and meet quarterly with the Prime Minister alongside these organisations.

We engage with business, including through partnerships with industry, with a view to helping them make nature-positive supply chain improvements.

We also work directly with research institutions and several government agencies, including the Ministry of Foreign Affairs and Trade, the Department of Conservation, the Ministry for the Environment, and Fisheries New Zealand.

We recognise the leadership of tangata whenua and seek to support the delivery of initiatives and outcomes prioritised by iwi and hapū.

Above all, we work constructively and bring innovative solutions to the table.

We look forward to working with you to protect Aotearoa's wild places and native species for future generations.



Working to sustain the natural world for the benefit of people and wildlife.

together possible. panda.org

WWF® and ©1986 Panda Symbol are owned by WWF. All rights reserved.

WWF, 28 rue Mauverney, 1196 Gland, Switzerland. Tel. +41 22 364 9111

CH-550.0.128.920-7