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## **Submission on Action for Nature: Implementing New Zealand's Biodiversity Strategy 2025-2030**

### **Introduction**

As one of the leading environmental Non-Governmental Organisations (eNGOs) in Aotearoa New Zealand, World Wide Fund for Nature New Zealand (WWF) supports science-based, pragmatic solutions that can deliver a future where humanity lives in harmony with nature. WWF appreciates the opportunity to make a submission on the next Implementation Plan of Te Mana o te Taiao – Aotearoa New Zealand's Biodiversity Strategy (ANZBS).

WWF strongly supports the vision and objectives of Te Mana o te Taiao and notes the international commitments New Zealand has made under the Convention on Biological Diversity (CBD) and the Kunming-Montreal Global Biodiversity Framework (GBF). We recognise the importance of the Implementation Plan as a mechanism to deliver the transformational change needed to halt and reverse biodiversity decline.

We are in a code red for nature. And we know that when nature is in trouble, we are also in trouble. Biodiversity underpins human health, wellbeing, resilience to climate change, and our economic prosperity. Our economy, including primary industries and tourism, are heavily reliant on a healthy natural environment. Primary industries in Aotearoa New Zealand make up 7% of our economy and earn annual export revenue of \$54.6 billion (2024).<sup>1</sup> Tourism expenditure generated \$13.3 billion of direct value added, representing a 3.7% contribution to GDP (2024).<sup>2</sup> Protecting our biodiversity and natural capital is not just a luxury, it's a necessity.

We acknowledge the complexity of the challenges ahead and the importance of working across sectors, civil society and with tangata whenua to deliver nature-positive outcomes. We broadly support the themes identified in the plan and the critical actions. However, we consider that the critical actions in the proposed Implementation Plan are not sufficiently detailed, prioritised, or ambitious enough to make significant progress towards the vision of Te Mana o te Taiao: "the life force of nature is vibrant and vigorous"; or the GBF mission: "to take urgent action to halt and reverse biodiversity loss" within the critical timeframe to 2030.

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<sup>1</sup> <https://wwf.org.nz/sites/default/files/2024-11/A%20Nature%20Positive%20Aotearoa.pdf>

<sup>2</sup> <https://www.stats.govt.nz/information-releases/tourism-satellite-account-year-ended-march-2023/#:~:text=Total%20tourism%20expenditure%20increased%2039.6,3.7%20percent%20contribution%20to%20GDP>

New Zealand has one of the highest rates of human-induced extinctions in the world - we can't afford to continue the path of high-level commitments that don't imbue confidence about how we are going to address the current biodiversity crisis. Unfortunately, the proposed Implementation Plan is insufficient in matching the urgency and scale of the biodiversity crisis. It needs to be bolder in its call to action; align more explicitly with the GBF targets; include priority actions that are measurable; and signal what investments are required to stem the biodiversity crisis. The plan should build public confidence, centre biodiversity recovery in its approach, and affirm the role of the New Zealand Government in delivering our domestic and international conservation commitments.

### **The Implementation Plan does not match the scale and urgency needed to address New Zealand's biodiversity crisis**

We are in the midst of a global biodiversity crisis, with Aotearoa New Zealand having one of the highest rates of extinction per capita. Biodiversity in New Zealand is unique and essential to our culture, identity, and wellbeing. It is estimated that 94% of our reptile species, 82% of bird species, 80% of bat species, 76% of freshwater fish species, 22% of marine mammal species and 46% of vascular plant species are either threatened or at risk of extinction.<sup>3</sup>

The major decline in our indigenous biodiversity is largely the result of the substantial reduction in the extent and quality of natural habitats. From the early clearance of native forests to the widespread draining of wetlands, the cumulative impacts have been profound and enduring. Pressures on our environment continue to degrade ecosystems including pressures of land-use change and intensification, pollution, natural resource use, climate change, and invasive species.<sup>4</sup>

We broadly support the themes that are guiding the Implementation Plan between now and 2030, and agree that improvements to the biodiversity system are required. However, The proposed Implementation Plan appears to be narrowly focussed on the enablers of change rather than advancing actions to actually reduce threats to biodiversity and address the direct drivers of biodiversity loss. The importance of addressing both direct and indirect drivers of biodiversity was explicitly acknowledged and reflected in the objectives and goals of Te Mana o te Taiao. The GBF is also clear about the importance of reducing threats to biodiversity (Targets 1-8) and we consider this needs to be more fully reflected in the Implementation Plan to ensure we take concrete steps towards those critical objectives, alongside wider improvements to the biodiversity system.

A focus on undertaking 'business as usual' activities to the exclusion of setting specific targets for key conservation outcomes risks further delays in advancing the urgent restoration and protection of our declining ecosystems and species. For example, we know that our riparian and wetland habitats are severely degraded and that we have only protected less than half a percent of our important marine and coastal environments. If New Zealand is serious about turning the tide for our native biodiversity, we need to set specific 2030 targets for restoring and protecting the ecosystems, habitats and species we already know are vulnerable or at risk. If we wait to implement a 'plan for a plan' we could miss the window for effective intervention to prevent collapse of our critical and life-supporting ecosystems.

We consider that Australia's [Strategy for Nature 2024-2030](#) provides a good example of how specific GBF Targets can be included alongside wider improvements to a national-level system, along with an articulation of clear indicators for measuring progress.

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<sup>3</sup> <https://www.stats.govt.nz/indicators/extinction-threat-to-indigenous-species/>

<sup>4</sup> Ministry for the Environment & Stats NZ (2022). New Zealand's Environmental Reporting Series: Environment Aotearoa 2022. Retrieved from [environment.govt.nz](https://environment.govt.nz)

## **The critical actions lack sufficient detail, clear rationale, and measurable accountability - and they fail to meet the expectations of the GBF**

The CBD's expectation for national Biodiversity Action Plans is that Specific, Measurable, Achievable, Realistic and Timebound (SMART) qualitative and quantitative targets and actions are developed appropriate to the national context and based on a national situational analysis. They should consider the effectiveness of past actions, existing monitoring systems and cross-sectoral policies, amongst other things (see para 7 of annex 1 of CoP Decision 15/6), plus include an analysis of: i) biodiversity assets, values, threats and drivers, and opportunities; ii) the socio-economic context; and, iii) the circumstances and needs of vulnerable groups.

We note that New Zealand updated its national targets to very loosely respond to the 23 GBF targets and submitted them to the CBD last year without undertaking any public consultation. Not only was this approach in direct contradiction to the expectations of the CBD for a whole-of-society approach in developing national targets and action plans, but the new national targets submitted are not SMART targets. Nor are they supported by sufficient analysis as to how they were developed (e.g. what past actions were considered; what actions were deemed a priority; what advancements were factored in; etc.) Further, the bifurcated process of developing targets separate to the critical actions has made it difficult to understand the linkages between the GBF targets, New Zealand's national targets, and the critical actions in the proposed Implementation Plan.

For example, New Zealand's submission of national targets claims that the new 13 national targets correspond to the 23 GBF targets; however, very little information was provided as to the degree of alignment with GBF targets and what the implications for halting and reversing nature loss are if there is a low level of alignment with some key GBF targets such as Targets 3, 7, 12-18 and 23. Additionally, there are at least 4 national targets (2, 6, 10 and 12) that do not correspond with any critical actions in the proposed Implementation Plan without explanation. We consider that national targets 10 and 12 are critically important for ecosystem conservation but they are not referenced anywhere in the Plan. For the national targets that are cross-referenced with the critical actions, it is sometimes unclear as to which aspects of the target are relevant or why some of the language from the target isn't reflected in the specific actions.

Taken together, all countries' National Biodiversity Strategy and Action Plans (NBSAP) should meaningfully and significantly advance the global mission of halting and reversing biodiversity loss by 2030. Each NBSAP needs to reflect the global mission to halt and reverse biodiversity loss by 2030, with national responses to each global target. To achieve this we need to see accelerated implementation of SMART actions that contain more detail about how things will get done and a rationale for how these prioritised actions will have the highest impact towards reaching our goals and the global goals of the GBF.

We need to honestly acknowledge the key areas that we are falling behind on with respect to direct drivers of biodiversity loss and ensure we are advancing measurable and accountable steps to reduce pressures on them, including impacts from our primary industries and development projects. We know that nature is vital, irreplaceable and its safeguarding is non-negotiable. If New Zealand is to credibly claim alignment with its international commitments, then our Implementation Plan must not be one based on political ideology and expediency but contain meaningful targets for biodiversity.

## **There is no clear line of sight as to how this Plan will progress the vision and objectives of Te Mana o te Taiao**

It is widely acknowledged that the 2022 ANZBS Implementation Plan was merely a compilation of existing policies or initiatives underway related to biodiversity, regardless of the degree of contribution or conservation impact. While this helped to get a better sense of what things were

happening and contributing at the time, it was also acknowledged that we needed a Plan to articulate what actions or initiatives would have the most impact and ought to be prioritised. In other words, we need a clear line of sight between our Strategy (Te Mana o te Taiao), all the necessary stages and actions that are required to achieve our goals over the long-term (i.e. a roadmap), and the actions proposed in the 5-year Implementation Plans.

This gap in long-term implementation planning risks failure to deliver on the Strategy, and critically, risks failure to ensure our biodiversity is able to recover. A supplemental document or roadmap would help signal what key actions were required over a longer time horizon, as well as provide a rationale for why focussing on a subset of those actions in the short-term is necessary. A roadmap such as the [Pathway to a Low Emissions Economy](#) is a helpful example that can show how critical actions might build on each other over time to achieve our goals.

We note that many of the critical actions appear to be high-level 2025 objectives or goals carried over from Te Mana o te Taiao. This means that many of the Te Mana o te Taiao goals were never advanced or at least not in a meaningful way by 2025, but no further information is provided about what the barriers were to achieving them. This is an example of the lack of transparency about how Te Mana o te Taiao is to be implemented over time and what barriers exist to achieving our goals.

We recommend that this Implementation Plan is framed within the broader context of what is required longer-term to achieve the goals and vision of our Strategy. This will instill confidence about our direction of travel and that DOC has a strategic view of the biodiversity system to properly support and execute key actions.

### **This Government's repeal and replacement of existing environmental legislative safeguards means we are going backwards in achieving our biodiversity goals**

A critical aspect of the biodiversity system is to have fit-for-purpose legislation and policies that preserve biodiversity and ecological integrity and reduce the direct and indirect pressures on them. Te Mana o te Taiao identified that legislation needs to be reviewed to ensure its effectiveness. We know several pieces of legislation fit into this category, such as The Marine Reserves Act 1971, Marine Mammals Protection Act 1978, and the Wildlife Act 1953. Yet, there is no mention in the Implementation Plan to review and update these despite the trajectory of our native wildlife, particularly those who rely on our marine environment.

The irony is also not lost on us that this Government is advancing a Biodiversity Implementation Plan when their own policies have single-handedly done more damage to the environment and our native biodiversity than any previous government in recent memory. This Plan fails to acknowledge the significant attacks on the environment and the very legislation intended to safeguard species and the habitats they reside (e.g. the Fast Track legislation, weakened freshwater regulations, removal of the oil and gas exploration ban, Fisheries Act reforms, Resource Management repeal and reforms, and surgical amendments to the Wildlife Act that remove the killing of native species as an offence).

### **We can't afford to continue to delay protection of our precious marine and coastal ecosystems and the 80% of our biodiversity that rely on them**

New Zealand has one of the largest ocean territories in the world, 15 times larger than our landmass. The ocean is home to approximately 80% of our native species.<sup>5</sup> Some of our greatest biodiversity losses are happening at sea, with 22% of marine mammals, 90% of seabirds and 80% of shorebirds are threatened with, or at risk of, extinction.<sup>6</sup> Despite this, we have only .04% of our marine

<sup>5</sup><https://www.cbd.int/countries/profile?country=nz#:~:text=While%20little%20is%20known%20about,marine%20species%20have%20become%20extinct>.

<sup>6</sup> <https://www.stats.govt.nz/indicators/extinction-threat-to-indigenous-species/>

environment under some form of high protection. The GBF Target 3 is clear that we need to conserve a minimum of 30% of our oceans globally to have a chance at stemming the dual crises of biodiversity loss and climate change facing our planet. Globally, we have only about 8% currently protected.

Our ocean provides the oxygen we need to breathe, supports a vast array of life and plays a central role in regulating the Earth's climate. Our ocean is home to millions of species and one of the most biodiverse ecosystems. It also acts as a major carbon sink, absorbing around a quarter of human-produced carbon dioxide emissions, and helps regulate global temperatures by storing and distributing heat through ocean currents. Healthy marine ecosystems are also incredibly important for human wellbeing, protecting coastlines and supporting livelihoods. However, climate change, overfishing, and pollution are just some of the threats facing our ocean. Protecting our marine environments essential for the health of the planet and of us.

At the third UN Ocean Conference (UNOC3) held earlier this month, countries reaffirmed their commitment to protecting 30% of the ocean by 2030. The conference catalysed several countries to announce new marine protected areas in their jurisdictions, increasing ocean protection from 8.4% to more than 10%.<sup>7</sup> French Polynesia pledged to create the world's largest marine protected area covering its entire exclusive economic zone, approximately 5 million square kilometres. Spain committed to creating five new marine protected areas that would allow protection of 25% of its marine territory.

For protected areas to be most effective they must be part of an ecologically representative network of interconnected areas covering key biodiversity hotspots that are safeguarded into the future by enhanced monitoring, enforcement and stakeholder collaboration. We know in Aotearoa that we also need updated fit-for-purpose MPA legislation as the Marine Reserves Act 1971 is not Treaty-consistent and does not provide the full suite of tools needed, including indigenous-led approaches to marine management.

Biodiversity on land has been prioritised for decades; however, we are woefully behind in providing anywhere near the same level of protection for our marine environment - despite that many marine species are declining. We consider that actions for protecting and restoring marine and coastal environments need to feature prominently in this Plan. We can no longer afford to delay critical actions for our marine environment - 30x30 goals are vital to the future of all life on Earth - including our own.

### **We need to be investing in nature now more than ever**

Aotearoa's natural environment, and the plants and wildlife it supports, is distinctly unique and deeply connected to our national identity. When nature is thriving, people are thriving. Biodiversity underpins human health, wellbeing, resilience to climate change, and our economic prosperity. Our economy, including primary industries and tourism are heavily reliant on a healthy natural environment.

We know that the value proposition for protecting and restoring nature is not well understood, yet, we also know that nature is our most important asset. Just like any asset, you need to invest in it to grow and maximise its benefits. Our recent [Nature Positive Aotearoa](#) report with EY shows that protecting nature could bring a net benefit to New Zealand's economy of more than \$270 billion over the next 50 years. It also points out that investment in nature needs to increase by approximately 6.5

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<sup>7</sup><https://www.un.org/sustainabledevelopment/blog/2025/06/closing-press-release-2025-unoc/#:~:text=The%20European%20Commission%2C%20as%20part,pollution%20on%20a%20global%20scale.>

times the current spend - roughly \$22.5 billion per year - if we are to meet key targets under the Global Biodiversity Framework.<sup>8</sup>

The Department manages one third of the country in the form of Public Conservation Land (PCL), the largest heritage portfolio in the country, and all our native species on less than 1 percent of New Zealand's Gross Domestic Product (GDP). And yet, successive governments have significantly underinvested in the Department and core conservation work for decades. This underinvestment has left the Department with a structural deficit and an inability to adequately fulfil its obligations to protect its natural and historical heritage for future generations.

We need an Implementation Plan that articulates the value of our natural capital, assesses the costs of what it would take to move the needle for nature and achieve our biodiversity goals, properly resources the Department and other biodiversity players, and signals where what areas of investment we need to prioritise.

### **In Summary**

The vision of Te Mana o te Taiao is to reverse decades of biodiversity decline, mobilise resources and people, and place nature at the heart of our national priorities. What is needed to deliver this is a strategic, transformational Implementation Plan that matches the scale of the challenge. We can't wait to make a 'plan for a plan'; we need to have a sense of urgency and ambition that inspires us to do more. Without a transformative approach grounded in conservation outcomes and a clear roadmap for where we need to go, New Zealand risks failing to meet both the goals of Te Mana o te Taiao and its international obligations under the CBD.

GBF Targets 1-8 are about reducing the threats to biodiversity and these are not well reflected in any of the proposed critical actions. Although a focus on wider system settings is important, addressing the direct drivers of biodiversity loss with SMART actions is mission critical. The table in Appendix 1 provides some examples of how critical actions could be rephrased, using similar language to the goals in Te Mana o te Taiao and with tangible metrics. The examples also include the two missing national targets 10 and 12, which we consider are important to have represented in this Plan.

The Government must prioritise bold, immediate actions that directly address key pressures on biodiversity, properly fund the Department of Conservation, include marine biodiversity as a core focus, and integrate clear accountability mechanisms and monitoring milestones. It must reflect the fundamental principle that nature is a foundational pillar of our wellbeing, economy, and identity. We hope the Government will seize this opportunity to lead with integrity, ambition, and urgency—delivering a truly meaningful Implementation Plan that can safeguard Aotearoa's unique natural heritage for generations to come.

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<sup>8</sup> <https://wwwf.org.nz/sites/default/files/2024-11/A%20Nature%20Positive%20Aotearoa.pdf>

## Appendix 1: Example of revised critical actions

Priority national targets	Corresponding GBF Targets reported in NBSAP	Current critical action	Proposed critical action(s)	Proposed milestones
Target 13: Biodiversity provides nature-based solutions to climate change and is resilient to its effect	Target 2 Target 8 Target 11	10: Encourage optimal investment in nature-based solutions, including the restoration and protection of native ecosystems for carbon and biodiversity benefits, by improving the evidence base, developing case studies and operationalising existing research	10a. Restore at least 50% of wetlands as a nature-based solution that contributes to nutrient cycling, flood mitigation and our net emissions targets *  10b. Identify and protect at least 30% of intact ecosystems and habitats, including in the marine and coastal environment, that provide maximum carbon and biodiversity benefits.	<ul style="list-style-type: none"> <li>By 2026 - Identify priority areas for wetland restoration and identify intact ecosystems that provide maximum carbon benefits for prioritised conservation efforts.</li> <li>By 2027 - identify key programmes and efforts and appropriate governance mechanisms needed for priority areas.</li> <li>By 2028 - Implement key programmes and efforts in priority areas.</li> <li>By 2029 - monitor progress and adaptively manage.</li> </ul>
Target 10: Ecosystems and species are protected, restored, resilient and connected from mountain tops to ocean depths	Target 1 Target 2 Target 3 Target 4 Target 21	<i>No critical actions proposed contribute to this national target</i>	Create an effective network of Treaty-consistent and indigenous-led marine protected areas to protect at least 30% of our marine jurisdiction.	<ul style="list-style-type: none"> <li>By 2027 - MPA legislative reform is underway.</li> <li>By 2028 - identify priority regions and ecological areas to protect, as well as collaborative groups in those priority regions.</li> <li>By 2028 - Advance the Kermadec/Rangitāhua Ocean Sanctuary.</li> <li>By 2029 - collaborative approach in priority underway.</li> <li>By 2030 - at least 30% of our marine area is</li> </ul>

				under Treaty-consistent marine protection or under a process to establish Treaty-consistent marine protection.
Target 5: Mātauranga Māori is an integral part of biodiversity research and management	Target 20 Target 21 Target 22	8. Support Māori to use knowledge systems, including mātauranga, in decision making and biodiversity management.	8. By 2030, all major conservation projects have incorporated Māori knowledge, including mātauranga, in decision-making and biodiversity management.	<ul style="list-style-type: none"> <li>By 2026 - conduct a national stocktake of existing Māori involvement and identify gaps.</li> <li>By 2027 - shared monitoring frameworks combining mātauranga and western science are implemented.</li> <li>By 2028 - Mātauranga Māori is embedded in decision-making, monitoring, and reporting processes for all major projects.</li> <li>By 2029 - Long-term structures and funding established to sustain Māori leadership and mātauranga in conservation.</li> </ul>
Target 3: Biodiversity protection is at the heart of economic activity	Target 10 Target 14 Target 15 Target 18 Target 19	5. Increase private investment in biodiversity by supporting business sector demand and system integrity: including private sector nature-based financial disclosures, reporting and investment	<p>5a. At least \$50 million per year of additional finance is mobilised towards halting and reversing biodiversity loss by 2030.</p> <p>5b. At least ⅓ of financial institutions in Aotearoa report and act on evolving nature-related issues, and move financial flows towards nature-positive outcomes.</p>	<ul style="list-style-type: none"> <li>By 2026 - complete nature prospectus with priority species, habitats, ecosystems to protect and identify key strategic partnerships.</li> <li>By 2027 - finance supports the Department's work and third-party collaborators in these priority areas.</li> <li>By 2026 - the Department develops partnership with a financial institution to run a flagship nature-related financial disclosure trial.</li> <li>By 2027 - reviews the approach, identifies gaps and adjusts accordingly.</li> <li>By 2028 - at least two more financial institutions implement a nature-related financial disclosure.</li> </ul>
Target 12: Natural resources are	Target 5 Target 7	<i>No critical actions proposed contribute to this national target</i>	Implement cameras on 100% of New Zealand's	<ul style="list-style-type: none"> <li>By 2026 - Investigate solutions to logistical barriers for cameras on all vessels.</li> </ul>



managed sustainably	Target 9 Target 10 Target 12 Target 16		<p>fleets to incentivise sustainable fishing practices and reduce fishing-related deaths of protected marine species towards zero.</p> <p>100% of fish stocks in QMS are regularly monitored and maintained above biologically sustainable levels.</p> <p>Aquaculture development is spatially planned to minimise effects on the environment and species, its carbon footprint, and its policy settings prioritise regenerative farming.</p>	<ul style="list-style-type: none"> <li>● By 2027 - cameras installed on vessels that have been previously exempt from the cameras programme.</li> <li>● By 2029 - data collection systems are optimised to ensure efficient and streamlined reporting.</li> <li>● By 2027 - monitoring systems are expanded and modernised to cover all QMS stocks.</li> <li>● By 2027/28 - harvest levels are set and enforced to maintain and rebuild stocks above biologically sustainable levels (precautionary approach).</li> <li>● By 2030 - regular independent reviews of QMS performance are being carried out against sustainability targets.</li> <li>● By 2026 - a clear, ecosystem-based spatial aquaculture planning framework has been developed for sustainable aquaculture.</li> <li>● By 2028 - carbon reduction requirements and environmental performance standards are in place for feed, waste, disease and habitat impacts.</li> <li>● By 2030 - sustainable seaweed aquaculture is incorporated into blue carbon strategies and national emissions reduction plans.</li> </ul>
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