

Rt Hon Christopher Luxon  
Prime Minister

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24 July 2024

### **You must take bold steps on biodiversity and climate**

Dear Prime Minister

In June 2024, EDS hosted its annual environmental conference, *Biodiversity, Climate and Us: The Future is Now*. This examined the severity of the biodiversity and climate crises, the interplay between them, and the need to address them urgently and synergistically to ensure a prosperous future for generations to come.

Nearly 500 people attended the event in-person and online. It was our biggest conference yet. It demonstrated the strong and widespread interest in your evolving environmental and climate policies. Many sectors were represented - it was not just environmentalists.

At the end of the conference we encouraged delegates to write to you, to tell you what they think of your environment and climate agenda, and to set out what needs to occur if we are to avoid further biodiversity loss and catastrophic climate change impacts.

We are deeply concerned about your proposed rollbacks of environmental protections across the board and lack of tangible action on climate change mitigation.

At our conference leading scientists spoke about alarming declines in ecosystem health across terrestrial, freshwater and marine domains. Two-thirds of our rivers are unswimmable. Four thousand indigenous species are threatened. Pests are stampeding our forests destroying indigenous biodiversity. Exotic species are taking hold in damaged ecosystems. Seabirds and fish are starving.

Climate change is already being felt and it will make everything much worse.

It was clear during our conference that the pace and scale of unwinding environmental and climate policies is causing frustration, anger and anxiety across the country, especially amongst young New Zealanders who will inherit the outcomes of your decisions.

Industry told us that the market is demanding emissions reductions, as well as broader environmental action beyond the status quo, including restoration and protection of indigenous biodiversity. There are clear tensions between your environmental policies and the country's export-led economy.

Many speakers could not fathom why Te Mana o te Wai was being written out of freshwater law.

We heard of the many successes achieved through mātauranga Māori led approaches, enabling kaitiakitanga, and applying an integrated world view. Many presenters emphasised the value of place-based decision-making, respect for environmental limits, rigorous cost-benefit analysis that accounts for environmental costs over the long-term, and collective efforts to rebuild ecosystem resilience through active restoration.

With that in mind, we urge you to:

**1. Push pause on legislative changes that override environmental limits**

Such proposals include the Fast-track Approvals Bill, the Resource Management (Extended Duration of Coastal Permits for Marine Farms) Amendment Bill and the Resource Management (Freshwater and Other Matters) Amendment Bill.

**2. Ensure regulatory processes are robust and evidence-based**

To date, your approach has fallen well short. The above Bills were all introduced without a clear problem definition, evidence basis or rigorous cost-benefit analysis. A tactical reliance on urgency has left inadequate time for consultation, expert input or appropriate public scrutiny. These factors risk creating bad law - as your Attorney-General has warned - and enduring poor outcomes for the environment and economy.

**3. Strengthen climate policies to drive urgent emissions reductions**

It's clear we must act now to drive down gross emissions. Nature cannot solve the climate emergency, only rapid and substantial cuts to greenhouse gas emissions can achieve this. Science confirms action is required *now* and the market demands it.

In this quarter, you will oversee development of New Zealand's second emissions reduction plan for 2026-2030. This is an opportunity to review the ETS, complementary policies, and the settings for agriculture and forestry to ensure we are on target to achieve net zero by 2050.

You have confirmed a commitment to meeting New Zealand's Nationally Determined Contribution, but we need a clear and transparent pathway for getting there.

**4. Deliver a robust Climate Change Adaptation Act**

How New Zealand adapts to the effects of climate change is completely within our control. This is where clever, forward-focused thinking can significantly reduce the impacts on our communities and (to an extent) on our natural world. For a start, we need to urgently stop new development in high natural hazard areas, and a national environmental standard would help with this.

EDS is pleased that you have adopted a cross-party approach to developing policy in this area through the Finance and Expenditure Select Committee's public inquiry into climate adaptation. We encourage you to tackle the hard questions including funding and compensation.

## 5. Restore and safeguard indigenous biodiversity

Your legislative and policy agenda fails to recognise the importance of the natural world. Seventy percent of our export earnings are highly or moderately dependent on nature. Thirteen of New Zealand's top 20 export commodities rely on natural capital. Nature is the lifeblood of our economy and underpins our standard of living. We cannot expect to build productivity without looking after natural capital.

So why are your policies removing protections for indigenous biodiversity and enabling activities that will further degrade it? Why are you implementing policies that amount to subsidies to farmers, contrary to our Free Trade Agreements? Protections for our precious biodiversity should remain and be strengthened by the rollout of biodiversity grants.

Your drive for electrification is supported, but it must not be at the expense of indigenous biodiversity. There are plenty of places to locate renewable energy infrastructure away from areas with high biodiversity values. Robust decision-making processes and strategic spatial planning can ensure this happens.

Protections for freshwater ecosystems need to remain, including the prioritisation of ecological health over use. Catchment groups should be supported to rollout local plans for freshwater improvement, subject to robust national direction.

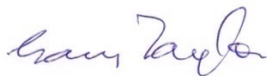
Oceans reform needs your attention as promised in National's manifesto. We need new approaches for marine protection. We appreciate your support for the Hauraki Gulf / Tikapa Moana Marine Protection Bill and look forward to its enactment shortly.

A future defined by climate change is inevitable. But what it looks like for New Zealand is up for grabs. There is still time to build resilience and implement responses that deliver for both the natural world and all New Zealanders.

We must act now and work together.

We intend to publish this as an Open Letter to you, along with your response.

Sincerely,



**Gary Taylor CNZM QSO**  
**Chief Executive**  
**Environmental Defence Society**